

S.L. No. 29/24



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA, WEST BENGAL

Original Application No. 129/2024/EZ

In the matter of:

Milan Kundu & Ors.

..... Applicants.

-Versus -

State of West Bengal & Ors.

..... Respondents.



AFFIDAVIT-IN-REPLY ON BEHALF OF THE APPLICANT/
COMPLAINANT TO THE COUNTER AFFIDAVIT ON BEHALF OF THE
MANIK KUNDU

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Filed by
Suleha Chandra Aika
Advocate
For the Applicants.

24 DEC 2024

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA, WEST BENGAL

Original Application No. 129/2024/EZ

In the matter of:

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-Versus -

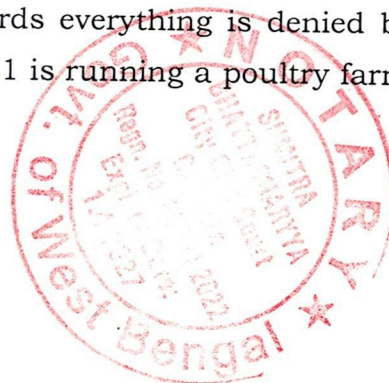
State of West Bengal & Ors.

..... Respondents.

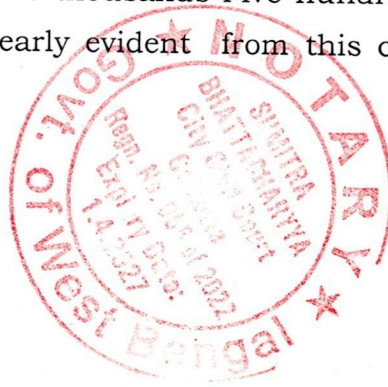
Affidavit-in-Reply on behalf of the Applicant/Complainant to the
Counter Affidavit on behalf of the Manik Kundu

I, Sri Milan Kundu, son of Bholanath Kundu, aged about 35 years, by faith-Hindu, by occupation -Ex-Military, residing at Village and Post Office- Janta, District- Bankura, Pin- 722122, do hereby solemnly affirm and state as follows:-

1. That I am the complainant no. 1 herein and as such I am well acquainted with the facts and circumstances of the case and I have been duly authorised to affirm and sign this affidavit on behalf of other complainants.
2. With reference to the Statement made in paragraphs 1 and 2 of the Counter Affidavit of respondent No.1, I state that save and except what would appear from records everything is denied by me.
3. With reference to the Statement made in paragraphs 3, 4 & 5 of the Counter Affidavit of respondent No.1, I state that save and except what would appear from records everything is denied by me. It is stated that the respondent No.1 is running a poultry farm in the said

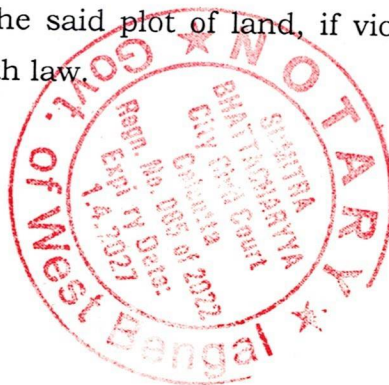


village under Plot No. 1359 in Mouza- Janta, J.L. No. 83 and thereby it is causing tremendous environmental pollution and health hazard and also soil pollution. Poultry farm is a source of odour and attract flies that create local nuisances and carry diseases and therefore the said poultry firm adversely affects the life of the villagers of the said village. It is stated that the respondent No.1 stated in his counter affidavit that he is not running a poultry farm, only poultry is sold here and trading is done and it is not at all a poultry farm as alleged for raising poultry. He also stated in his counter affidavit that for trading poultry the respondent has obtained Trade Licence issued by Radhanagar Gram Panchayat and is also having the requisite land record in his name. From the annexure marked with letter "A" being Trade Licence it is clearly evident that Trade Registration No. 37/2010-2011 dated 07.02.2011 and Trade Registration Issue No. 93/2017 - 2018 dated 06.07.2017 the description of Trade as mentioned in the said Certificate issued by the Pradhan of the concerned Gram Panchayat is for "**KUNDU FEED CENTRE**" only in the said plot No. 1359, Mouza- Janta which means not for selling of poultry from the said farm but he himself has stated in his Counter Affidavit that only poultry is sold here and trading is done. Therefore, he has failed to comply the said description of trade given by the said Panchayat. From the page No.8 of the counter affidavit it is clearly evident which he has annexed that the description of trade is **Feed Stores and Farm** which he has collected from the electronically generated process being Trade Registration No. 637 dated 01.08.2018 but in the said certificate he has inserted in the trade description as "Farm" by manipulating through on-line, whereas in earlier Registration Certificate issued by the Concerned Gram Panchayat as "**KUNDU FEED CENTRE**". The Gram Panchayat acknowledges a sum of Rs. 1,500/- (Rupees One thousands Five hundred) from "**KUNDU FEED CENTRE**". It is clearly evident from this certificate which is



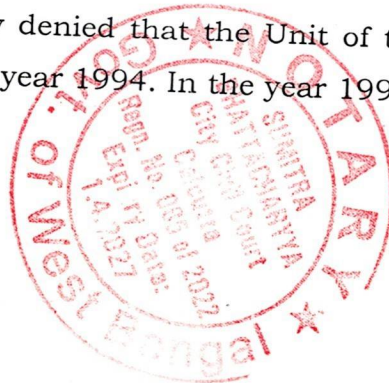
electronically generated that the grant of certificate shall not absolve the applicant from requirement of procuring all the statutory clearances to be obtained from the appropriate authority before actual commencement of the trade. If any violation/default is noted later, the certificate shall be liable to be cancelled and trade/business shall be closed down with immediate effect. Therefore, the requirement of procuring the statutory clearance to be obtained from the appropriate authority before actual commencement of the trade is firstly required the NOC from the concerned Panchayat.

But from the answer as given by the concerned Pradhan of the said Gram Panchayat by Memo No. 547(7)RGP/2024 dated 06.11.2024 with regard to the application under Right to Information Act, 2005 of the learned advocate of the applicant it is clearly evident that the Pradhan has not been given any NOC in the name of the Respondent No.1 for the business either for poultry or for boiler or for the farm of poultry/boiler and also it was certified that the Natya Mancha and Deep Tube-well was established/constructed by the government fund/exchequer through Panchayat. It is further stated that very recently the Complainants came to know from the Pradhan of the concerned Gram Panchayat that a notice by Memo No. 631/RGP/24 dated 18.12.2024 has been issued to the respondent no. 1 intimating him that as per application of the villagers of the said village as well as the Member of the said Gram Panchayat it is informed to the respondent no. 1 that "no objection Certificate" was not given to him for construction of a shed/poultry farm for the purpose of selling or trading of poultry and only "no objection Certificate" was given to him for feeding store. Therefore, he can do the business for feeding store and cannot do the business of selling or trading of poultry on the said plot of land, if violates, action will be taken in accordance with law.



Copy of said Memo dated 06.11.2024 of the Pradhan of the concerned Gram Panchayat is annexed herewith and marked as annexure "A".

4. With reference to the statement made in paragraphs 6 and 7 of the counter affidavit of the respondent no. 1, I state that save and except what would appear from records everything is denied by me. It is stated that the inspection report dated 24.07.2024 along with the affidavits of the District Magistrate, Bankura as well as the District Veterinary Officer, Bankura is absolutely false, fabricated, concocted and without any basis. The Unit of the respondent no. 1 is a absolutely stoking shed and thereafter the same were sold to different meat selling outlets from the said Farm and also at the farm location though he has got no trade license for stocking and trading of poultry/broiler. The report has been made in order to favour the respondent no. 1 who is the politically influential person in the locality under the present ruling party. If re-inquiry is being done by the concerned authority in presence of complainant and others it would be clear and unearth the truth.
5. With reference to the statement made in paragraph 8 and 9 of the counter affidavit of the respondent no. 1, I state that save and except what would appear from records everything is denied by me. It is denied that one of the complainants had admitted that he has no convenience due to broiler shed. It is firmly denied that without understanding the contents of the complaint he has signed on the complaint. It is stated that when the respondent no. 1 has no trade license for stocking and trading of poultry and, therefore, no question does arise with regard to the capacity of broiler which is much less than 5000. It is firmly denied that the Unit of the respondent no. 1 was established in the year 1994. In the year 1994 the respondent no.



1 had no land in the said plot in question, he got the land by way of deed of gift only on 12.08.2009, therefore, the said statement of the concerned authority is malafide, baseless and false.

A copy of the said deed of gift is annexed herewith and marked as annexure "B".

6. With reference to the statement made in paragraph 8 and 9 of the counter affidavit of the respondent no. 1, I state that save and except what would appear from records everything is denied by me. It is firmly denied that there is any rivalry in between the complainant and the respondent no. 1 in connection with the property related issue and/or personal grudge. The complainant is an ex- Army who served the Nation more than 16 years and therefore there is no connection with the respondent no. 1 and he has made the complainant due to the predicament situation of the locality.

7. It is humbly submitted that the said counter affidavit of the respondent no. 1 is full of concocted, incorrect and misleading statement, hence the same should not be relied upon and the same is dismissed with exemplary costs.

8. That the statement made in paragraphs are 1 - 6 true to my knowledge and the statements made in paragraphs 7 are my respectful submission before the Hon'ble Tribunal.

Melan Kundu
Deponent

Identified by me

Sulehas Chandra Aikā
Advocate

Solely Affirmed and
Declared before me U/S 139
CPC, (C)

Sumitra Bhattacharya
Notary

Sumitra Bhattacharya
Notary, Govt. of W.B.
Regd. No. 065 of 2022
City Civil Court, Calcutta

24 DEC 2024



VERIFICATION :

I, Sri Milan Kundu, son of Bholanath Kundu the deponent within named state that this affidavit is verified at Kolkata by the deponent above-named on this the _____ day of December, 2024 and say that the contents of this affidavit made in paragraph Nos.1-6..... and those made in paragraph7..... are my humble submissions before this Hon'ble Tribunal.

Identified by me

Enlehas Chandu Aika
Advocate

Milan Kundu

Deponent



Solely Affirmed and
Declared before me U/S 139
CPC, (C)

Sumitra Bhattacharyya
Notary

Sumitra Bhattacharyya
Notary, Govt. of W.B.
Regd. No. 065 of 2022
City Civil Court Calcutta

Sumitra Bhattacharyya
Notary, Govt. of W.B.
Regd. No. 065 of 2022
City Civil Court, Calcutta

Phone No-(03244) 257229

e-mail:-wbregs.radhanagar@gmail.com

OFFICE OF THE

RADHANAGAR GRAM PANCHAYAT

VILL & P.O.- BON-RADHANAGAR, BLOCK - BISHNUPUR, DIST.- BANKURA

MemoNO.-547(7)RGP/2024

Date-06/11/2024

Subhas Chandra Atha
Advocate
High Court at Calcutta

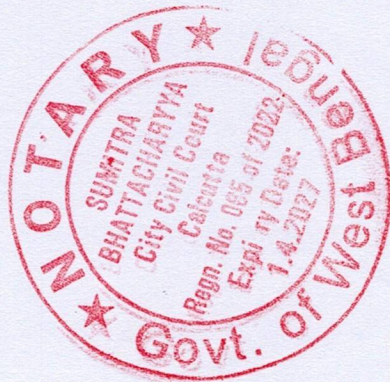
Sub:- Answer of RTA of Subhas Chandra Atha, Advocate, Calcutta High Court.

মহাশয়,

আপনার পাঠানো RTA চিঠি তারিখ ২৪/১০/২০২৪ অনুযায়ী জানানো যায় যে, আমাদের অফিস তথ্য অনুযায়ী জম্মা মৌজার ১৩৫৯ নং দাগে মানিক কুড়ু, পিতা-নিমাই এর নামে কোন পোল্টি বা ব্রয়লার মুরগীর ব্যবসা করার জন্য বা পোল্টি বা ব্রয়লার ফার্ম করার জন্য প্রয়োজনীয় NOC দেওয়া হয় নি।

উক্ত মানিক কুড়ুর পোল্টি ফার্ম লাগোয়া যে নাট্য মঞ্চটি ও পানীয় জলের নলকুপটি রয়েছে অফিস তথ্য অনুযায়ী জানা যায় সেগুলি সরকারি অর্থে পঞ্চায়েতের মাধ্যমে নির্মাণ করা হয়।

উপরোক্ত তথ্য গুলি আমার জ্ঞান ও বিশ্বাস মতে সত্য।



Prachan
Prachan
Radhanagar Gram Panchayat
রাধানগর গ্রাম পঞ্চায়েত

- 6A -

English Translated Copy of Page 6 Annexure-A of the Affidavit in reply on behalf of the Applicant to the counter Affidavit on Behalf of Manik Kundu

OFFICE OF THE

RADHANAGAR GRAM PANCHYAT

VILL & P.O.- BON RSDHANAGAR, BLOCK- BISHNUPUR, DIST- BANKURA

Memo No. 547(7)RGP/2024

Date- 06/11/2024

Subhas Chandra Atha
Advocate
High Court at Calcutta

Sub: Answer of RTA of Subhas Chandra Atha, Advocate, Calcutta High Court.

Sir,

This is to inform you that in terms of your application under RTA dated 24.10.2024 that there was not given any NOC in the name of Manik Kundu, son of Late Nemai for the purpose of business of Poultry/ Broiler and/or for establishment of Poultry Farm/ Broiler Farm in Mouza- Janta, Plot No. 1359.

That the Natya Mancha and Deep Tubewell for drinking water adjacent to Manik Kundu's Poultry Farm which is built by the fund of the State Government through Panchayat as per office record of the Panchayat.

That the above statements are true to my knowledge and belief.

Sd/-

Pradhan

Radhanagar Gram Panchayat





- 7 -

From - Mr. Subhas Chandra Atha
 Advocate
 HIGH COURT CALCUTTA
 Bar Association Room No. 3
 Phone: 2248-2188/7180/7243-7183
 Fax: (033) 2248-2333
 E-mail: bar.association@rediffmail.com
 Residence

To
 The State Public Information Officer being
 the Pradhan, Radhanagar Gram Panchayat, P.O. Bon Radhanagar,
 Bishnupur, Bankura (WB),
 Pin No. 722157.

Sub: An application under section 6(1) of Right to Information Act, 2009.

Respected Sir,

With due respect I, Subhas Chandra Atha, Advocate, Bar Association, Room No. 3, High Court at Calcutta, on behalf of my client namely - Milan Kundu son of Bholanath Kundu residing at Village : Janta, P.O. Janta, P.S. Bishnupur, District : Bankura, want to know some relevant information from your end and hence you are hereby requested to furnish the desired information within the stipulated period as laid down in the said Act and an early arrangement in this regard will highly appreciated.

INFORMATION SOUGHT FOR :

1. Whether the Owner of the Poultry Firm namely Manik Kundu, son of late Nema Kundu of Village & P.O. Janta, P.S. Bishnupur, District Bankura has obtained any trade license from the concerned Panchayat for running of business of poultry/broiler birds in Plot No. 1359, Mouza: Janta or not? If yes, let me know the information and supply the xerox copy of the same.
2. Whether for running of the said business under the jurisdiction of the concerned Panchayat, obtaining a trade license is mandatory or not?. If yes, let me know the information and supply the copy of the notification/ order/instruction in this regard, if any, of the State Government concerned Department.
3. Whether a Government Natya Mancha or a tube-well is situated beside the said Firm but under which Scheme or Fund the said Natya Mancha was established and when?. And with regard to the tube when was it established by the concerned Department? Let me know the information.

Soliciting early reply.

Thanking you.

Dated : 24.10.2024

Yours faithfully,
 Subhas Chandra Atha
 24.10.2024
 (Advocate)

Court Fees Rs.10/-
 (Contact No.9382406707)



Basanti Pradhan
 Pradhan
 Radhanagar Gram Panchayat

year - 2009

Deed 2010 8 - Annexure - 'B'



পশ্চিমবঙ্গ পশ্চিম বঙ্গাল WEST BENGAL
 Deed No. 2-2010 Fol. 2509

98AB 461982



Sd/- J. Mukherjee
 ADDL. DIST. SUB-REGISTRAR
 BISHNUPUR, BANKURA
 20/09/24

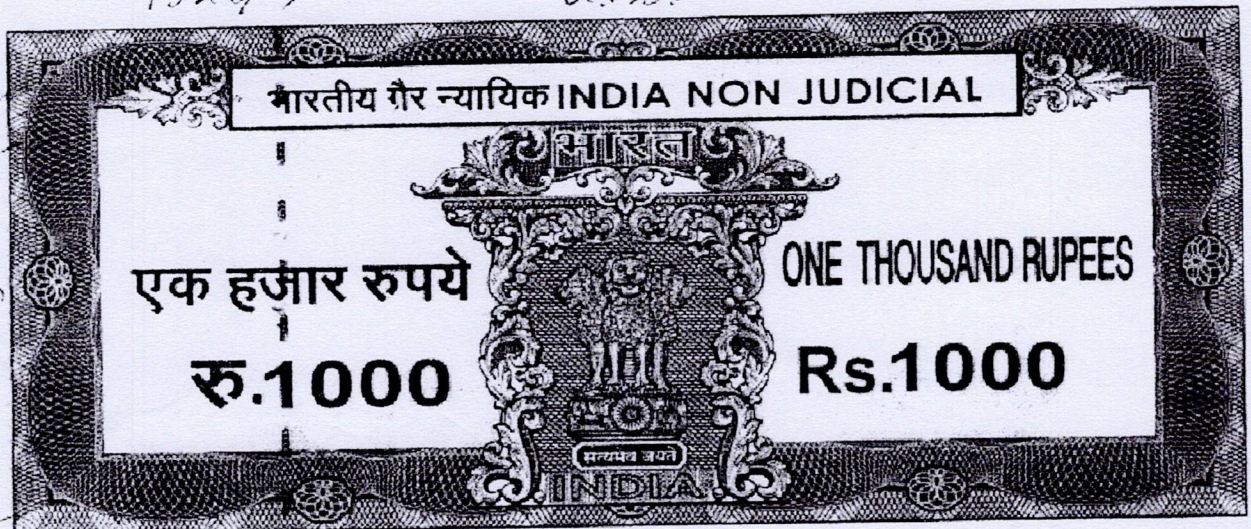


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পশ্চিমবঙ্গ পশ্চিম বঙ্গাল WEST BENGAL

B 822033

দান করা হইল ২৬/৪/০৯, ঢাকা

আল বিহার



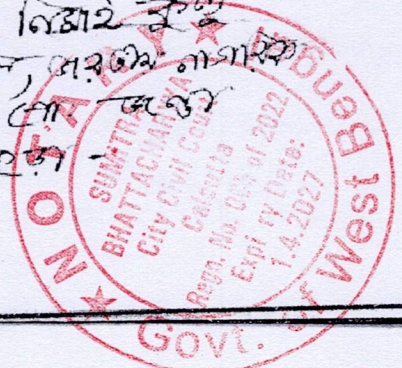
WHEREBY that the document is admitted to registration. The signature sheet and the endorsement sheets attached with this document are the Part of this document.

GOV. DIST. SUB-REGISTRAR
DHAKA, BANGLA

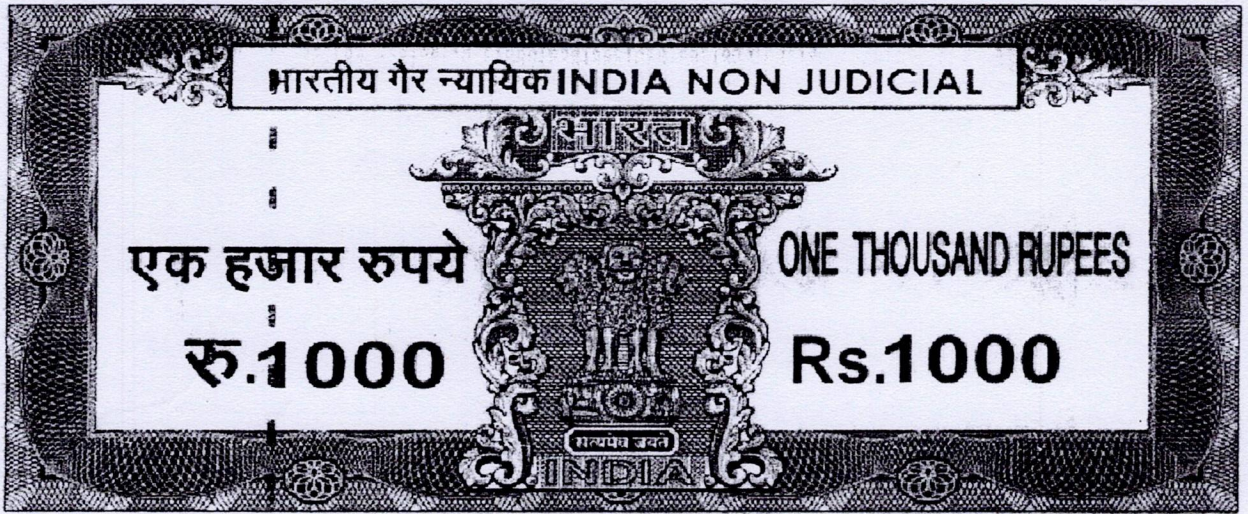
[12 AUG 2009

সি বিহার

দান করা হইল
শ্রী হানিক বুলু বিটা শ্রী নিহারী বুলু -
আট হিঙ্গু শ্রী দাদাচাঁদ, সরকারী নগর
লক্ষা বুরজা, জা জগা, গো জগা
আল বিহার, জেলা বর্ধমান



(6)



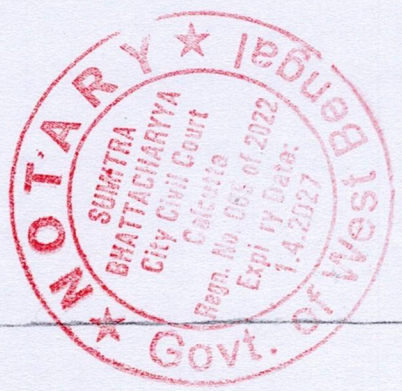
पश्चिमवङ्ग पश्चिम बंगाल WEST BENGAL

B 822035

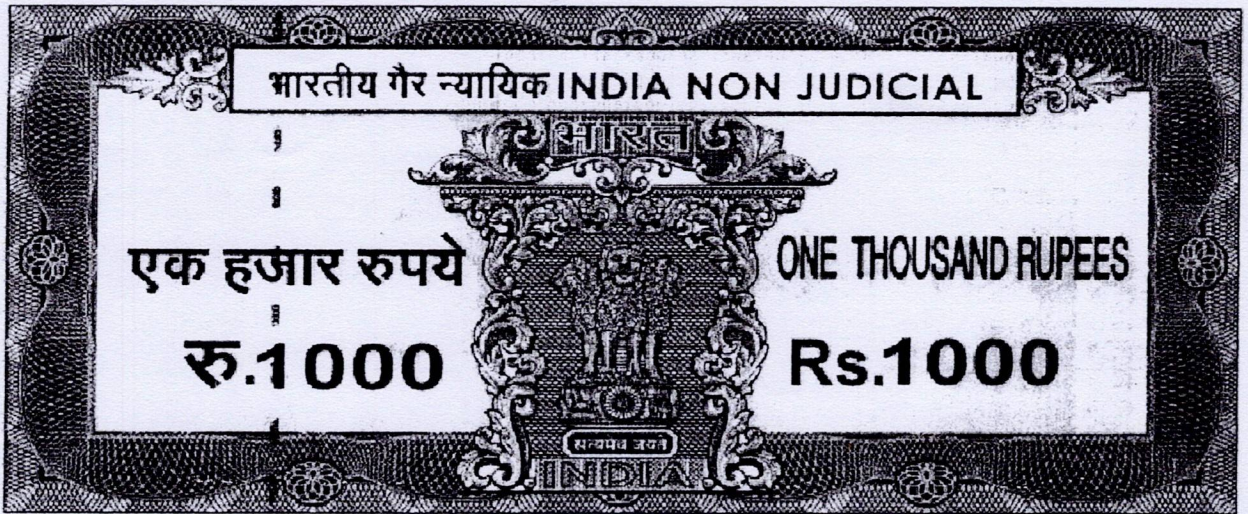
आवकाश प्राप्त करीब आठ सौ रुपये का मालिकाना हक का
 गैर न्यायिक दस्तावेज जारी करने के लिए प्रार्थना है कि
 प्रमाणित किया जाय कि यह दस्तावेज सही और सत्य है
 और इसमें कोई भी त्रुटि नहीं है। यह दस्तावेज
 जारी करने के लिए आवश्यक सभी दस्तावेजों को
 प्रस्तुत किया गया है। यह दस्तावेज जारी करने
 के लिए आवश्यक सभी दस्तावेजों को प्रस्तुत
 किया गया है। यह दस्तावेज जारी करने के लिए
 आवश्यक सभी दस्तावेजों को प्रस्तुत किया गया है।

Handwritten signature or initials in vertical script on the right side of the document.

अतः यह दस्तावेज सही और सत्य है और इसमें
 कोई भी त्रुटि नहीं है। यह दस्तावेज जारी करने
 के लिए आवश्यक सभी दस्तावेजों को प्रस्तुत
 किया गया है। यह दस्तावेज जारी करने के लिए
 आवश्यक सभी दस्तावेजों को प्रस्तुत किया गया है।



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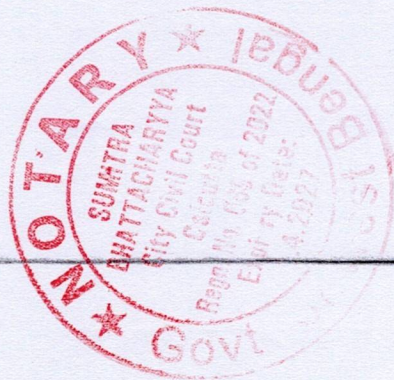


পশ্চিমবঙ্গ পশ্চিম বঙ্গাল WEST BENGAL

B 822036

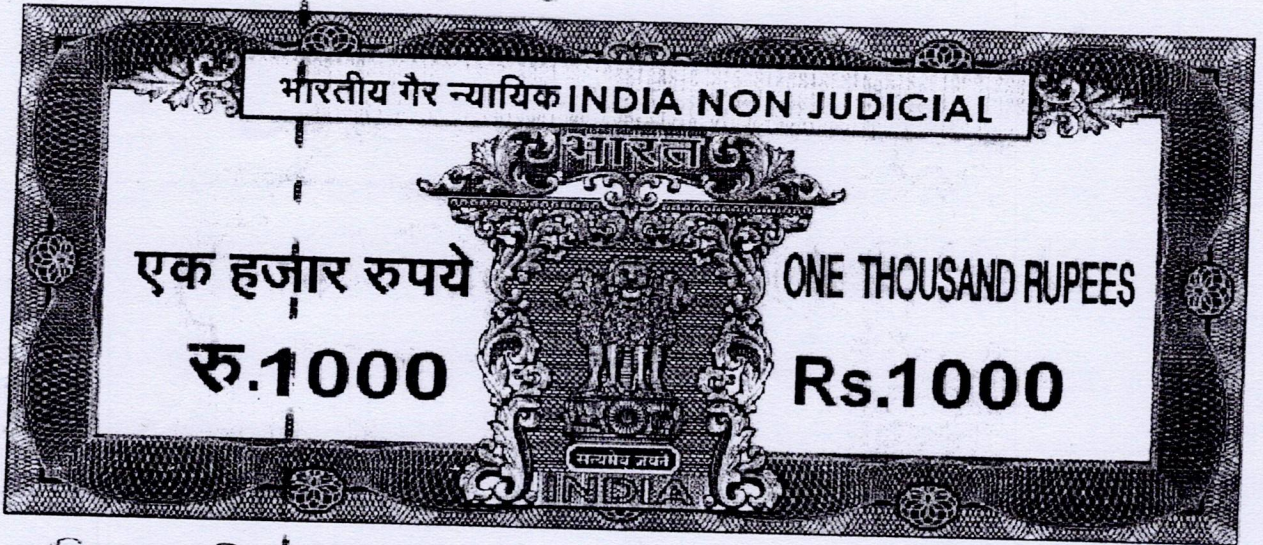
৩১ মে মৌলিক
 ৩১ মে মৌলিক না হোকি অন্য ও অতিরিক্ত কোন অর্থ
 বিলম্ব করণের লক্ষিত্য বিহীন সাক্ষীর জোয়ার জেতা
 ক্র. এল. নং ৬৬ L.R. প্রতিবাদ নং ৪৭৬/১ ক্র. ৬
 R.S. ও L.R. মাজ নং ২৬৫-১৩৩ নং ৬৬ উল্লেখিত-ডাক্তার
 ২.৫৬ একর জমি ০.২৫০০ একর নাগরিক বাস ০.৬৫ একর
 জমি জামার জিজ্ঞাসা নং ৬৬ একর নাগরিক বাস ২২৬ একর
 জমি ০৭ একর মতক ডাক্তার মাল করিলাম। যাশর
 উত্তরে লালিকা কুতুর প্রকৃষ্টা ডাক্তার, মহিলে সিদ্ধি
 কুতুর ডাক্তার, মূলে মাল কুতুর ডাক্তার, পশ্চিমে
 মাদর মেসি এর ডাক্তার ও সিদ্ধি কুতুর ডাক্তার,
 উত্তরে মাজর মিসিষ্ট ডাক্তার। সাক্ষর-স্বঃ। (মস জমা
 হারবারী সাক্ষর ২) ডাক্তার সাক্ষর সি সাক্ষর জাম ও সিদ্ধি মাল।
 ৪৪ ০৭ একর ৫১০ একর ডাক্তার মাল করিলাম।

৩১ মে মৌলিক
 ৩১ মে মৌলিক না হোকি অন্য ও অতিরিক্ত কোন অর্থ
 বিলম্ব করণের লক্ষিত্য বিহীন সাক্ষীর জোয়ার জেতা



14

(A)



पश्चिमबङ्गा पश्चिम बंगाल WEST BENGAL

B 822037

जिसे मालिकाना २२५ रुपाय भागदर इतिहास माह २०१०
 निम्नलिखित ३ ४ २५ रुपाय मर एम. रुपाय मूल
 २ (अ) विहित अतिरिक्त भागदर भागदर इतिहास मर २०१०
 हरे इतिहास १५२५ लाहौर भाग अतिरिक्त रुपाय निम्नलिखित
 इतिहास २२५ रुपाय मालिकाना अन्तर्गत मर इतिहास

श्री गणेशाय नमः

श्री गणेशाय नमः

इतिहास
 आदि मर इतिहास
 मर + मर इतिहास
 मर इतिहास

मर - मर
 मर - मर इतिहास

मर - मर इतिहास

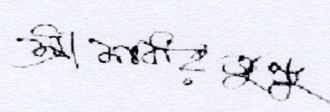
निम्नलिखित D.S.R. निम्नलिखित
 ६२ ५ मर इतिहास
 मर मर इतिहास
 मर इतिहास




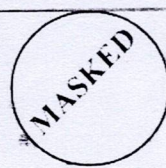
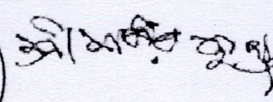
15

Government of West Bengal
Department of Finance (Revenue) , Directorate of Registration and Stamp Revenue
Office of the A.D.S.R. BISHNUPUR, District- Bankura
Signature / LTI Sheet of Serial No. 01928 / 2009, Deed No. (Book - I , 02010/2009)

I . Signature of the Presentant

Name of the Presentant	Signature with date
Shri Shankar Kundu	 22/08/09

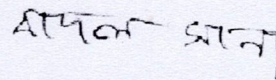
II . Signature of the person(s) admitting the Execution at Office.

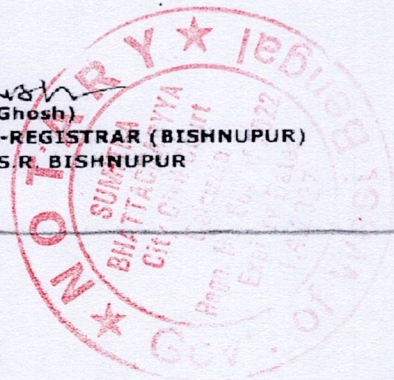
Sl No.	Admission of Execution By	Status	Photo	Finger Print	Signature
1	Shri Shankar Kundu Address - Vill - Janta P. O. - Janta Dist - Bankura	Self			
			12/08/2009	12/08/2009	

Name of Identifier of above Person(s)

Badal Sana
PS Bishnupur, Vill - Janta P. O. - Janta Dist. - Bankura

Signature of Identifier with Date


22/08/09



16

Government Of West Bengal
Office of the A.D.S.R. BISHNUPUR
BISHNUPUR
Endorsement For deed Number :1-02010 of :2009
(Serial No. 01928, 2009)

On 12/08/2009

Certificate of Admissibility(Rule 43)

Admissible under rule 21 of West Bengal Registration Rule, 1962 duly stamped under schedule 1A Article number 33
of 4 of Indian Stamp Act 1899 also under section 5 of West Bengal Land Reforms Act, 1955 Court fee stamp paid Rs
10.00/-

Payment of Fees:

Fee Paid in rupees under article A(1) = 1474/- E = 7/- on 12/08/2009

Certificate of Market Value(WB PUVI rules 1999)

Certified that the market value of this property which is the subject matter of the deed for Gift in f/o others except family
members Government Local Body has been assessed at Rs- 134012/- for the chargeability of the Stamp duty and
registration fees
Certified that the required stamp duty of this document is Rs 6711 /- and the Stamp duty paid as Impresive Rs- 5000

Deficit stamp duty

Deficit stamp duty Rs 1711/- is paid by the Bankers cheque number 506260, Bankers Cheque Date 10/08/2009 Bank
Name STATE BANK OF INDIA Bishnupur received on 12/08/2009

Presentation(Under Section 52 & Rule 22A(3) 46(1))

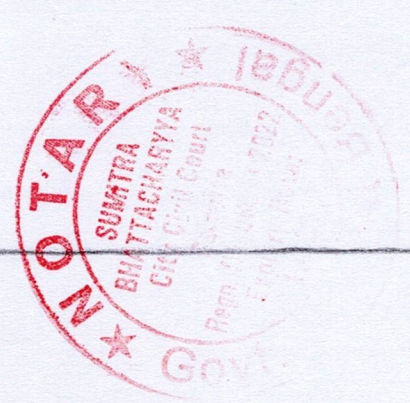
Presented for registration at 11 10 hrs on 12/08/2009 at the Office of the A D S R BISHNUPUR by Shankar
Kundu Executant

Admission of Execution(Under Section 58)

Execution is admitted on 12/08/2009 by
1. Shri Shankar Kundu, son of Late Suchand Kundu, Vill. - Janta P. O - Janta Dist - Bankura Thana Bishnupur
By caste Hindu by Profession Cultivation
Identified By Badal Sana, son of Late Kanai Sana Vill. - Janta P. O - Janta Dist - Bankura Thana Bishnupur by caste
Hindu By Profession Cultivation

[Signature]

[Hilol Ghosh]
ADDITIONAL DISTRICT SUB-REGISTRAR (BISHNUPUR)
OFFICE OF THE ADDITIONAL DISTRICT SUB-REGISTRAR (BISHNUPUR)
Govt. of West Bengal



Certificate of Registration under section 60 and Rule 69.

Registered in Book - I
CD Volume number 8
Page from 3287 to 3303
being No 02010 for the year 2009.



Hilol Ghosh
(Hilol Ghosh) 12-August-2009
ADDITIONAL DISTRICT SUB-REGISTRAR (BISHNUPUR)
Office of the A.D.S.R. BISHNUPUR
West Bengal

Certified to be a true copy

Checked by *[Signature]*

[Signature]
JDL. DIST. SUB-REGISTRAR
BISHNUPUR, BANKURA
20/09/24

- 17 A -

English Translated Copy of Page 8 Annexure-B of the Affidavit in reply on behalf of the Applicant to the counter Affidavit on Behalf of Manik Kundu

1928/2009

Joy Guru

I no. 2010/2009

Year- 2009 Deed no. 2010.

Government of West Bengal

Deed of Gift valued at Rs. 1,34,012/-

P.S.- Bishnupur

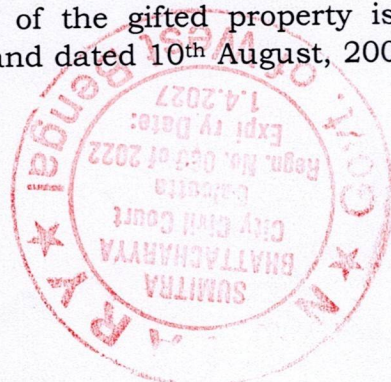
DONEE Sri Manik Kundu, Son of Nimai Kundu, Caste- Hindu, Classification Dadwas Tili, Citizen- Indian, Occupation- Business, village- Janta, P.O.- Janta, P.S. Bishnupur, Dist- Bankura **ONE PART**

And

DONER Sri Sankar Kundu Son of Late Suchand Kundu Caste- Hindu, Classification Dadwas Tili, Citizen- Indian, Occupation-Cultivation, village- Janta, P.O.- Janta, P.S. Bishnupur, Dist- Bankura **OTHER PART**

This is to declare that the schedule below property got by doner by way of legal heirs of the predecessor in interest which is transferable and said schedule bellow property has been duly recorded in the name of Late-Suchand Kundu. Threfore, the Donee being the nephew of Donner intends to accept the deed of Gift and as the Donee respects, honors, esteems and admires the Donner very much and due to such behaviour and respect, the Doner has been declared to donate the land and the and the donee accepted that proposal and immediately the Doner had gifted the Schedule below property in favour of the Donee by way of this deed of gift and in the said property the Donner has relinquished his right, title and interest in the said property and no one will claim any right, title in the said property, if any claim is being done by the legal heirs of the doner that will not be accepted in future and the Donee will transfer the said property and pay the taxes to the State year to year and the donee can record his name in the Record of Rights and the legal heirs of the donee will enjoy the fruits of the property and possess the property forever, and no one will claim the said property on behalf of donner in future, if done so, that will not be accepted in accordance with law and will be cancelled.

And, therefore, without any hindrance or obstruction from any corner I am gifting this property to you and the value of the gifted property is Rs. 1,34,012/- on 1416 BS dated 24th Shraban and dated 10th August, 2009 as per English Calender.



- 17 B -

2.

Schedule of the property

District- Bankura, Chowki Thana and Additional District Sub Register Bishnupur Bankura, Mouza- Janta, J.L. no. 83 L.R Khatian No. 476/1 under R.S. and L.R. Dag no. 1359 Danga, out of 2.50 Acres 0.2500 Part Kat 0.65 Acres, his shares 1/3rd part Kat and out of 21 2/3, 07 Decimals had been gifted.

North Side: Purchased Land of Latika Kundu

Southern Side: Land of Bibhuti Kundu

East Side: Land of Madan Kundu

West Side: Land of Jadev Dey and land of Bibhuti Kundu

And in the Northen side the rest portion of the land of Doner

Therefore 0.7 Satak of land classification as Suna had been gifted.

In this deed in page no. 1 Doner's signature with passport size photo and after page no. 6, and before page no. 5, 1 (Ka) marked in additional papers doner's signature chronologically two hands finger print is annexed and this will be considered as main deed.

Sd/-

Sankar Kundu

Witness

Badal Sana

Son of late Kanai Sana

Vill & P.O. Janta, Bankura

Krishna Gorai
Son of Bijoy Gorai
Vill- Bishnupur

Bishnupur ADRS Office
Deed writer Gopal Chandra Dutta
License no. 39 village- Jamthara





National Green Tribunal

Case Title	Milan Kunda Vs. State of West Bengal and ors
Miscellaneous No.	1902134002452024/7
Transaction id	1900210225752024
Bank Transaction id	2412240033789
Payment Date	2024 -12 -24 00:00:00.0
Amount	100 Rs.
Status	SUCCESS

S. No.	File Name	Party Name	Location	Document Type
1	affidavit in reply.pdf	Milan Kunda	KOLKATA(EASTERN ZONE BENCH)	Rejoinder

BEFORE THE HON'BLE NATIONAL
GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA,
WEST BENGAL

Original Application No. 129/2024/EZ

In the matter of:

Milan Kundu & Ors.

..... Applicant.

-Versus -

State of West Bengal & Ors.

..... Respondents.



Affidavit-in-Reply on behalf of the
Applicant/Complainant to the Counter
Affidavit on behalf of the Manik Kundu

Subhas Chandra Atha
Advocate
Bar Association, Room No.3
High Court, Calcutta
Mobile:
9382408707/9732262585
Email Id: 2scatha@gmail.com