



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

I. A. No. 14 of 2025/EZ
(Arising out of ORIGINAL APPLICATION NO. 221/2024/EZ)

In The Matter of:

An application Under Section 19(4)(a) read with Under Section 18 (1) of the National Green Tribunal Act, 2010 for addition of Rakhi Mondal, W/o Ashim Mondal residing at Nazirabad, Karimpur, Uchhepota, District: South (24) Parganas, Pin: 700150, as a party respondent in connection with the instant original application;

AND

In The Matter of:

Rakhi Mondal, W/o Ashim Mondal residing at Nazirabad, Karimpur, Uchhepota, District: South (24) Parganas, Pin: 700150,

E-mail : rajdeppramanik5@gmail.com

..... Applicant

-Versus-

1. Capt. P. Bhowmik, S/o Unknown, residing at 137, Nazirabad Road, P.O-Uchhepota, Khedaya-2, District: South (24) Parganas, Pin: 700150, West Bengal & Ors.

Email: capt.bpartho@gmail.com

.... Respondent No. 1/Applicant
in O. A



INDEX

SL	PARTICULARS	ANNEXURE	PAGE
1.	Interlocutory Application		1-11
2.	Photocopies of the Aadhar Card, Mutation Certificate and Record of	"P-1"	12-26

27 JAN 2025

	Rights are collectively annexed herewith		
3.	Proof of Service (Email)	"P-2"	-17-

Filed by

Rajdeep Pramanik

Rajdeep Pramanik

Advocate

C/o Atarup Banerjee

Advocate

Bar Association, Room No.-1,

High Court, Calcutta

For The Applicant

Email: rajdeeppramanik5@gmail.com

(M): 7044771667



- 3 -

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

I. A. No. of 2025/EZ

(Arising out of ORIGINAL APPLICATION NO. 221/2024/EZ)



In The Matter of:

An application Under Section 19(4)(a) read with Under Section 18 (1) of the National Green Tribunal Act, 2010 for addition of Rakhi Mondal, W/o Ashim Mondal residing at Nazirabad, Karimpur, Uchhepota, District: South (24) Parganas, Pin: 700150, as a party respondent in connection with the instant original application;

AND

In The Matter of:

Rakhi Mondal, W/o Ashim Mondal, residing at Nazirabad, Karimpur, Uchhepota, District: South (24) Parganas, Pin: 700150,

E-mail : rajdeppramanik5@gmail.com

..... Applicant

-Versus-

4 -

1. Capt. P. Bhowmik, S/o
Unknown, residing at 137,
Nazirabad Road, P.O- Uchhepota,
Khedaya-2, District: South (24)
Parganas, Pin: 700150, West
Bengal & Ors.

Email: capt.bpartho@gmail.com

.... Respondent No. 1/
Applicant in O. A



2. The Ministry of Environment,
Forest and Climate Change, notice
through the Secretary,
Government of India, having office
at 2nd Floor, Agni Block, Indira
Paryavaran Bhawan, Jorbagh
Road, New Delhi, Pin: 110003.

Email: secy-moef@nic.in

3. The West Bengal Pollution
Control Board represented through
its Member Secretary, having office
at 10A, Block-LA, Sector-III, Salt
Lake City, Kolkata: 700106.

Email: net.wbpcb-wb@bangla.gov.in

4. The Department of Environment, notice through the Principal Secretary, Department of Environment, Government of West Bengal "Pranisampad Bhaban", 5th Floor, LB-II, Sector- III, Bidhannagar, Kolkata- 700106.

E-mail: psecy.env-wb@gov.in



5. The East Kolkata Wetland Management Authority, notice through the *Member Secretary* having office at "Pranisampad Bhaban", 5th Floor, LB-II, Sector- III, Bidhannagar, Kolkata- 700106.

E-mail: ctoekwma@gmail.com

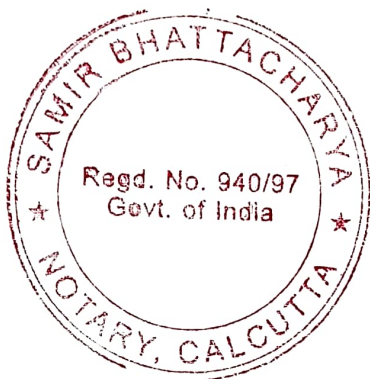
6. Rajpur Sonarpur Municipality through its Executive Officer having office at 27, Netaji Subhash Chandra Bose Road, Harinavi, Kolkata, Pin:700148

Email: contact@rajpursonarpurmunicipality.in

- 6 -

7. Department of Urban Development & Municipal Affairs, Government of West Bengal through its Secretary having office at Nagarayan, DF-8, Sector-I, Salt Lake City, Kolkata-700064.

Email: secy.ma-wb@gov.in



8. The District Magistrate & Collector, South (24) Parganas, having office at Administrative Building, Alipore, Kolkata: 700027.

Email: dm.south24parganas@gmail.com

.....Respondents

To,

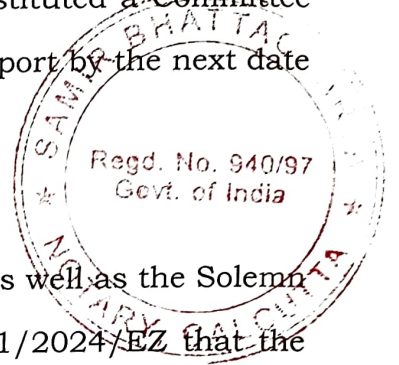
The Hon'ble Chairperson and His Companion Member of the said Hon'ble Tribunal.

The Humble petition on behalf of the applicant as above named most respectfully

SHEWETH:

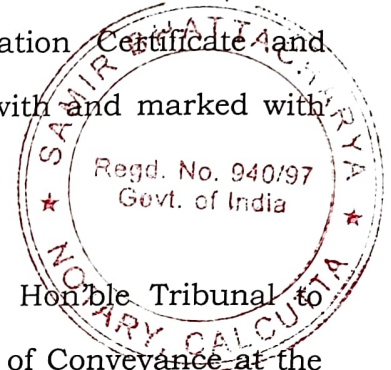
1. That the instant original application on the basis of a letter complaint and Email letter has been filed by the applicant and the same is pending for adjudication before this Hon'ble Tribunal.

2. That as per Order dated 02.12.2024 the Hon'ble National Green Tribunal, Eastern Zone Bench, Kolkata had constituted a Committee and the Committee has been directed to file its report by the next date of listing on 27.01.2025.
3. That it is apparent from the letter petition as well as the Solemn Order dated 02.12.2024 passed in O. A. No. 221/2024/EZ that the disputed wetland belonging within a particular area wherein a part and parcel of land in the nature of 'SALI' (Agricultural land) belongs to the applicant herein and in the said context any Order/Orders are passed without impleading the applicant as a party respondent in the original application the present applicant will be highly prejudiced more so the original applicant has got no Locus Standi to institute the letter petition before this Hon'ble Tribunal.
4. That Your Applicant in this Interlocutory Application also states and submits that there are certain relevant documents in respect of the property belonging to this applicant which are to be placed on record by way of affidavit for such presence of the applicant is very much necessary for proper and effective adjudication of the original application being O. A. No. 221/2024/EZ.
5. That the applicant is having land situated at Mouza-Karimpur, J. L. No. 02, Sonarpur, within L. R. Dag No. 65, L. R. Khatian Number



289, district: South (24) Parganas, Pin: 700150 i. e within the land as alleged in the letter petition.

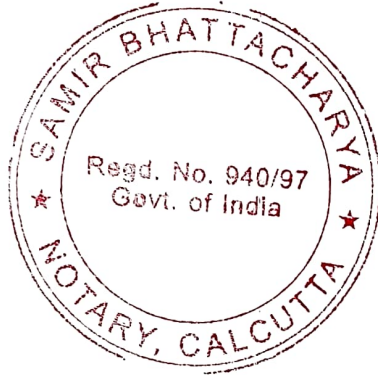
Photocopies of the Aadhar Card, Mutation Certificate and Record of Rights are collectively annexed herewith and marked with the letter 'P-1'.



6. That this applicant craves leave of this Hon'ble Tribunal to produce and submit the photocopy of the Deed of Conveyance at the time of submitting Counter Affidavit.
7. That the allegations as stated in the original application are completely denied by this applicant and this applicant humbly prays that she may be added as a party respondent in this original application and may be given an opportunity to make her submissions before the Hon'ble Tribunal.
8. That unless the applicant is added as a party respondent in the present proceedings i.e in this original application she will be highly prejudiced if any Order/Orders are passed by the Hon'ble Tribunal in the suit land as she is also one of the owner/Raiyat in respect to a part and parcel of land situated in the alleged site.
9. That it is most humbly submitted before this Hon'ble Tribunal that the applicant namely Rakhi Mondal may be added as a party respondent for smooth adjudication of the instant original application.

10. That this application is made bonafide and unless this application is allowed by this Hon'ble Tribunal the applicant will suffer irreparable loss and injury.

Under the above circumstances it is most humbly prayed before Your Lordships may kindly be pleased to allow this application and permit the applicant namely Rakhi Mondal to be added as a party respondent in connection with the instant original application and to pass such further Order/Orders as to this Hon'ble Tribunal may deem fit and proper for the ends of justice.



And For This Act of Kindness Your Applicant as in duty bound shall ever pray.



VERIFICATION:

I, Rakhi Mondal, W/o Ashim Mondal, residing at Nazirabad, Karimpur, Uchhepota, District: South (24) Parganas, Pin: 700150, the deponent within named, do hereby verify and declare that the statements made in the aforesaid paragraphs are true and correct to the best of my knowledge and information and I believe that nothing material has been concealed there from.

Verified at Kolkata on the 27th Day of January, 2025.

Identified by me

Rajdeep Pramanik
Advocate

Rakhi Mondal
Deponent



240



P1 -
AFFIDAVIT



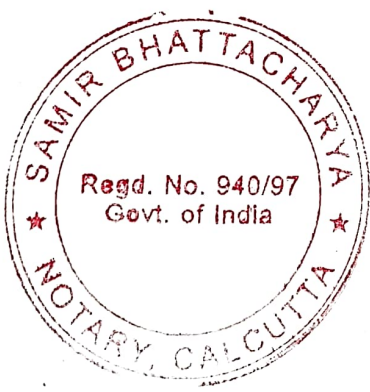
I, Rakhi Mondal, W/o Ashim Mondal, aged about 46 years, by faith-Hindu, by occupation- housewife and residing at Nazirabad, Karimpur, Uchhepota, District: South (24) Parganas, Pin: 700150, do hereby solemnly affirm and state as follows :-

1. That I am the applicant in the instant Interlocutory Application and well conversant with the fact and circumstance of the case and I am competent to sign and swear this affidavit.
2. That I have read and Understood the contents of the accompanying application and say that the facts stated above are true and correct as per my personal knowledge and legal advice received by me are the best of my knowledge and belief.

Rakhi Mondal
DEPONENT

Prepared in my office
Rajdeep Pramanik
Advocate
F/2117/2018/2022

Identified by me
Rajdeep Pramanik
Advocate



Solemnly Affirmed and Declared before me U/S 139 CPC/U/S297 (C) CRPC

27.1.25
Notary
Samir Bhattacharya
Notary Govt. of India
Regd. No. 940/97
City Court, Calcutta

27 JAN 2025

-12-

Annexure - P-1



ভারতীয় বিশিষ্ট পরিচয় প্রাধিকরণ

ভারত সরকার

Unique Identification Authority of India

Government of India

তালিকাভুক্তির আই ডি / Enrollment No.: 1190/22461/71471

To
রাখী মন্ডল
Rakhi Mondal
W/O Ashim Mondal
NAZIRABAD
Karimpur
Uchhepota
South Twenty Four Parganas
West Bengal 700150

46053045



MN460530457FT



আপনার আধার সংখ্যা / Your Aadhaar No. :

3002 8893 0939

আধার - সাধারণ মানুষের অধিকার

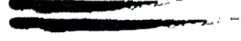


রাখী মন্ডল
Rakhi Mondal
পিতা : মকরন্দ সরদার
Father : Makaranda Sardar
জন্মতারিখ / DOB : 07/10/1979
মহিলা / Female



3002 8893 0939

আধার - সাধারণ মানুষের অধিকার



তথ্য

- আধার পরিচয়ের প্রমাণ, নাগরিকত্বের প্রমাণ নয়।
- পরিচয়ের প্রমাণ অনলাইন প্রমাণীকরণ দ্বারা লাভ করুন।

INFORMATION

- Aadhaar is proof of identity, not of citizenship .
- To establish identity, authenticate online .

- আধার সারা দেশে মান্য।
- আধার ভবিষ্যতে সরকারী ও বেসরকারী পরিষেবা প্রাপ্তির সহায়ক হবে।
- Aadhaar is valid throughout the country .
- Aadhaar will be helpful in availing Government and Non-Government services in future .



আধার

ঠিকানা:
W/O অসীম মন্ডল, নাজিরাবাদ,
করীমপুর, উচ্ছেপোতা, দক্ষিণ ২৪
পরগণা, পশ্চিমবঙ্গ, 700150

ভারতীয় বিচারিক পরিচয় প্রমাণীকরণ
Unique Identification Authority of India

Address:
W/O Ashim Mondal, NAZIRABAD,
Karimpur, Uchhepota, South
Twenty Four Parganas, West
Bengal, 700150

3002 8893 0939

1947
00 300 1947

help@uidai.gov.in

www
www.uidai.gov.in

Annexure - P-1

- 13 -

Receipt No. : KH-2 /

FORM - 4

G.P.Code No.-07
Pin No. — 16150716

147

পঞ্চায়েত কর, অভিকর এবং ফি আদায়ের রসিদ

খেয়াদহ-২নং গ্রাম পঞ্চায়েত • সোনোরপুর পঞ্চায়েত সমিতি

কর দাতার নাম Rakhi Mondal পিতা/বামীর নাম Ashim Mondal
ঠিকানা Murshabad জমির বিবরণ দক্ষিণ ২৪ পরগণা
মৌজা Kanimpur জে.এল.নং 2 আর.এস./এল.আর. দাগ নং 65 আর.এস./এল.আর. খতিয়ান নং 289
জেলা পরিষদ South 24 Pn জমির চরিত্র Shali পরিমাণ 2-14-30 নির্ধার তালিকার অংশ 18
নির্ধারিত তালিকায় উল্লিখিত কর প্রদানকারী ব্যক্তির ক্রমিক সংখ্যা- 2014-105 সন 2014-105

যে বারদ কর/তক্ক ধার্য হইয়াছে তাহার বিবরণ	বকেয়া	বকেয়া	বকেয়া	বকেয়া	বকেয়া	হাল	মোট		মোট	টাকা	পঃ
							বকেয়া	হাল			
যে বারদ কর/তক্ক ধার্য হইয়াছে তাহার বিবরণ						2014-105					
জমি ও ইয়ারতের উপর কর						2100 ✓			2100	2100 ✓	
বৃষ্টি ব্যবসা বা পেশার উপর কর											
যানবাহন নিবন্ধিকরণ ফি											
জল অভিকর											
আলো অভিকর											
মল ও ময়লা নিষ্কাশন অভিকর											
অন্যান্য ফি বা অভিকর											
মোট টাকা										2100	✓

মোট আদায় : (অকে)

(কথায়) ০৭১০৭০৭

তারিখ

2100 ✓
Hul Hem onekhan Rumpal Mondal

স্বাক্ষর
আদায়কারী / পঞ্চায়েত সচিব

Translated Copy

-14-

FROM-4

Receipts for collection of Panchayat Taxes, Duties and Fees

Kheyadaha- 2no Gram Panchayat, Sonarpur Panchayat Samiti

Tax Collector Name- Rakhi Mondal, Father/ Husband Name- Ashim Mondal,
Address- Nuzinabad, Description of Land-, Mouza-
Karimpur, J.L. No- 2, RS and LR No- 65, RS and LR Khatian No- 289 District
Council-South 24 Parganas, Nature of Land- Shali, Amount- 2-14-30, Part of- 1

The serial number of taxpayers mentioned in the prescribed list:- Year- 2024-25

Details of Withholding tax/ duties	Outstanding	Outstanding	Outstanding	Outstanding	Total Outstanding	Total Outstanding
Tax on land/ buildings					2100/-	2100/-
Tax on trade or profession						
Vehicle registration fees						
Water tax						
Light Tax						
Drainages and usages tax						
Other fees and taxes						
Total Amount						2100/-

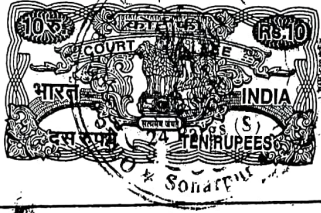
Total Collection- 2100/-

(Rupees Two Thousand One hundred Only)

Date- 04/07/2024

Signature

Collection Agent/ Panchayat Secretary

জেলা - দাক্ষিণ ২৪-পরগনা		খতিয়ান নং - ২৮৯		[৬৬১৫০০২]	
পৌজা - কারমপুর		জে.এল.নং - ২		থানা - সোনারপুর	
(১) রাজস্ব - ০.০০ টাকা					
(২) জমির মোট পরিমাণ - ০.০৬ একর		(৩) মোট দাগের সংখ্যা - ১			
(৪) অত্রস্বত্বের দখলকারের বিবরণ		(৫) স্বত্ব		(৬) মন্তব্য	
নাম	রাখা মন্ডল	স্বত্ব			
**ধর্ম/স্বামী	অসিম				
ঠিকানা	নিজ				
(৭) অত্রস্বত্বের নিজ দখলীয় জমি :					
দাগ নম্বর	জমির শ্রেণী	দাগের মোট পরিমাণ একর	দাগের মধ্যে অত্র স্বত্বের অংশ	দাগের মধ্যে অত্র- স্বত্বের জমির অংশের পরিমাণ	
				একর	হেক্টর
৬৫	শালি	১৫.১৩	০.০০৪১	০.০৬	
 <p>CERTIFIED TO BE A TRUE COPY Officer Authenticated U/s-76 of Indian Evidence Act.</p> <p>Certified to be true copy of the Original R.O.R. finally framed & finally published under sub Section (2) of Sec-81 (A) of W.B.L.A. Act.</p> <p>১৫/৭/১১</p> <p>Reverend Officer</p> <p>জমি সংস্কার দপ্তর</p>					
দাগের মোট সংখ্যা		এক মাত্র		০.০৬	

Appl. Fee: Rs.10, Authentication Fee: 1 x Rs.10 = Rs.10, Total: Rs.20

Translated Copy

-16-

District	South 24 Parganas	Khatian No	289	[1615002]	
Mouja	Karampur	J. L. No.	2	P.S- Sonarpur	
(1) Revenue	0.00	Rupees			
(2) Total amount of Land	- 0.06	Acres	(3) Total Number of Spots--1		
(3) Description of the occupier of the premises		(5) Sawta	(6) Remarks		
Name	Rakhi Mondal	Rayat			
Father / husband	Ashim				
Address	Own				
(i) Self Occupied Land of Attraswat:					
Spot Number	Land	Particulars	Total Spots	Self own spot	
			Acres	Acres	Hector
65	Shali Land		15.13	0.0041	0.06
Total Amount of Dag				0.06	

From Rajdeep Pramanik • rajdeepramanik5@gmail.com
To Sibojyoti Chakrabarti • subho.advocate@gmail.com
Sudip Kumar Dutta • adv.skdutta@gmail.com
Aviator Akash • capt.bpartho@gmail.com
nameeta.prasad@gov.in
Date 27 Jan 2025, 12:23 pm
See security details

Dear Sir,

Kindly find enclosed copy of interlocutory application alongwith all annexure in O.A. 221 of 2024 / EZB for your kind perusal.

Enclosed as above

Regards

**Rajdeep Pramanik, Advocate
High Court, Calcutta**



Rakhi Mondal - Petition.pdf



Rajdeep Pramanik 1:01 pm

to secy-moef ^



From Rajdeep Pramanik • rajdeepramanik5@gmail.com
To secy-moef@nic.in



Reply



Rakhi Mondal

VAKALATNAMA

In The ~~High Court at Calcutta~~

DISTRICT :

National Green Tribunal, E2 B, Kolkata.

I. A. No. 12025/ET Constitutional Writ Civil Criminal Revisional
O. A. No. 221 of 2024/E2 Appellate Jurisdiction

Rakhi Mondal

{ Appellant
Petitioner

-Versus-

Capt. P. Bhowmik & ors

{ Respondent
Opposite Party

Vakalatnama on behalf of petitioner RAKHI MONDAL

Knows all men by these presents that by Vakalatnama, I/We appoint the Advocates noted below or any one of them my/our lawful Advocate or Advocates for filling the memorandum of appeal or petition of entering appearance

in the above matter for appearing conducting and arguing the same for depositing or withdrawing any money in connecting therewith for moving the Court in any matter connected therewith, for preparing the paper book in the case and for putting in papers, petitions, etc. On my/our behalf for filing, taking back any documents for withdrawing suits or appeals or petitions with permission to institute fresh suit etc. For signing and filing petitions of compromise in connections with the said matter and for taking copies of paper from the Record and I/We further say that any act done by my/our said Advocate or Advocates or by any one of them after accepting this Vakalatnama, shall be considered as my/our own true and lawful act.

And I/We further hereby agree and undertake to pay the said Advocates his or their fees as settled and all others sums that may be necessary to carry out the requisitions of the Court and otherwise to enable the said Advocates to conduct the case properly. Failing which the said Advocates after notice to me/us will be at liberty to withdraw from the further conducting the case.

IN WITNESS WHEREOF I/WE sign and execute this Vakalatnama on this the 27th day of January, 2025

Name of Advocate:

Rajdeep Pramanik -
Advocate

Bar Association Room No. 1
High Court, Calcutta.

M. - 98049 35589

E-mail - rajdeeppramanik5@gmail.com

Received the vakalatnama from
the executor and satisfied.
Rajdeep Pramanik
Advocate

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

I.A. No. of 2025/EZ

(Arising out of ORIGINAL
APPLICATION NO.221/2024/EZ)

In The Matter of:
Rakhi Mondal

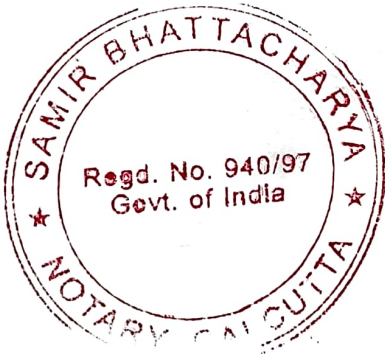
... Applicant

Versus

Capt. P. Bhowmik & Ors.

... Respondents

INTERLOCUTORY APPLICATION
ON BEHALF OF THE APPLICANT



Rajdeep Pramanik
Advocate
C/o Atarup Banerjee
Advocate
Bar Association, Room No.-1,
High Court, Calcutta
For The Applicant
Email: rajdeeppramanik5@gmail.com
(M): 7044771667