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**BEFORE THE NATIONAL GREEN TRIBUNAL,  
EASTERN BENCH, KOLKATA**

**MEMORANDUM OF APPLICATION**

**I.A. NO. 88 OF 2025**

IN

**ORIGINAL APPLICATION NO. 177 OF 2025**

**IN THE MATTER OF:**

RIZWAN

...APPLICANT

VERSUS

STATE OF JHARKHAND & ORS

...RESPONDENTS

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**FILED BY:**

*V D*

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Place: Kolkata

Filed on: 17.09.2025



**BEFORE THE NATIONAL GREEN TRIBUNAL,  
EASTERN BENCH, KOLKATA**

**MEMORANDUM OF APPLICATION**

**I.A. NO. \_\_\_\_\_ OF 2025**

**IN**

**ORIGINAL APPLICATION NO. \_\_\_\_\_ OF 2025**

**IN THE MATTER OF:**

RIZWAN

...APPLICANT

VERSUS

STATE OF JHARKHAND & ORS

...RESPONDENTS

**APPLICATION FOR EXEMPTION FROM FILING LEGIBLE  
TYPED COPIES OF THE ANNEXURES**

TO,

THE HON'BLE CHAIRPERSON  
AND HIS COMPANION MEMBERS  
OF THE NATIONAL GREEN TRIBUNAL

THE HUMBLE ORIGINAL APPLICATION  
OF THE APPLICANT HEREIN:

**MOST RESPECTFULLY SHOWETH:**

1. The present Application is being filed under Section 14 and 15 of the National Green Tribunal Act, 2010 raising a serious *Substantial Question relating to the Environment*, by challenging the District Survey Report [**IMPUGNED DSR**] for District Godda, Jharkhand. The present OA further challenges the Impugned E-Auction Notice dated 02.09.2025 [**IMPUGNED AUCTION NOTICES**] issued by the Respondent No. 4 District Mining Officer, Godda and the



subsequent Letter of Intents (LOIs) issued if any in furtherance of the said Impugned Auction Notices.

2. That the detailed facts and circumstances leading to the filing of the present Application have been set out in detail in the body of the Application and the same are not being repeated herein for the sake of brevity and to avoid prolixity. The Applicant craves leave of this Hon'ble Tribunal to refer to and rely upon the averments and submissions made in the body of the Original Application and the same may be read as part and parcel of the present Application also.
3. That the Annexure filed as Annexure A-11 is the Impugned DSR of District Godda and has been downloaded from the website of the District Administration. It is submitted that some of the pages of the said Annexure are dim/illegible, and the Applicant is unable to get a clear copy or get the same typed. Therefore, this Hon'ble Tribunal may graciously be pleased to exempt the Applicant from filing the legible copies of the said Annexure.
4. That the Application is made bonafide and in the interest of justice.

### **PRAYER**

In view of the above facts and circumstances and reasons stated above, it is humbly prayed that this Hon'ble Tribunal may be pleased to:

- a) Exempt the Applicant from filing the legible copies of Annexure A-11 appended to the present Original Application;

✱

- b) Pass any other Orders as the Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the instant case;

**AND FOR THIS ACT OF KINDNESS THE APPLICANT AS IN  
DUTY BOUND SHALL EVER PRAY**

**FILED BY:**



**[VANSHDEEP DALMIA]**  
COUNSEL FOR THE APPLICANT  
206, Jor Bagh, New Delhi-110003

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Email id: [vanshdeepdalmia@gmail.com](mailto:vanshdeepdalmia@gmail.com)

Place: Kolkata

Filed on: 17.09.2025

✕

Serial No. 51, dated 15.9.25

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

I.A. NO. \_\_\_\_\_ OF 2025

IN

ORIGINAL APPLICATION NO. \_\_\_\_\_ OF 2025

IN THE MATTER OF:

RIZWAN

...APPLICANT

VERSUS

STATE OF JHARKHAND & ORS

...RESPONDENTS

AFFIDAVIT

I, Md Rizwan aged about \_\_\_\_\_ years S/o Imran R/o Habibpur, Bhatuabadi Habibpur, Jagdishpur, Post and Police Station- Bhagalpur, District- Bhagalpur, Bihar - 813105, do hereby solemnly affirm and declare as under:

\* That I am the Applicant in the above Original Application and I am well conversant with the facts and circumstances of the case and competent to depose the present Affidavit.

That I have read and understood the contents of the accompanying application(s) which has been drafted on my instructions and I say that the facts stated therein are true to my knowledge.

3. That the averments of facts stated herein above are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

*Md Rizwan*  
DEPONENT

VERIFICATION:-

Verified at Bhagalpur on this 15<sup>th</sup> day September 2025, that the contents of the present affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

DEPONENT

*Md Rizwan*

*Verified by  
Md. Shamim Akhtar  
15-09-25  
EN-15262000*

deponent... Md. Rizwan  
Who is identified by... Md. Shamim Akhtar  
I solemnly affirm and declare  
before me

*Md. Shamim Akhtar*  
Notary, Bhagalpur



