



IA-36/2026/EZ

Sunit Kumar <sunit.kumar99@gmail.com>

Service of Interlocutory Application – O.A. No. 49/2025/EZ (Manbodh Kumar vs. State of Bihar & Ors.)

Sunit Kumar <sunit.kumar99@gmail.com>

Fri, Mar 13, 2026 at 8:23 PM

To: "guptanutritions@gmail.com" <guptanutritions@gmail.com>, ssp-patna-bih@gov.in, sho-danapur@biharpolice.gov.in, cs-bihar@nic.in, "sdodanapur10@gmail.com" <sdodanapur10@gmail.com>, "enquiry@bholaramsteels.com" <enquiry@bholaramsteels.com>, info@rktraders.com, msbspcb-bih@gov.in, dm-patna.bih@nic.in, "dfopatnafdivision@gmail.com" <dfopatnafdivision@gmail.com>, mscb.cpcb@nic.in, info@msbpolymer.com, "938644@gmail.com" <938644@gmail.com>, jyoti_jeewan@rediffmail.com, dir.ind-bih@nic.in

To,

All Respondent Parties

Respected Sir/Madam,

Kindly take notice that the Applicant has filed an Interlocutory Application in O.A. No. 49/2025/EZ titled Manbodh Kumar vs. State of Bihar & Ors. before the National Green Tribunal, Eastern Zone Bench, Kolkata.

A copy of the said Interlocutory Application is being served upon all the respondents through this email for their kind information and necessary action.

Kindly acknowledge receipt of the same.

Yours faithfully,

Sunit Kumar

Advocate for the Applicant

O.A. No. 49/2025/EZ

 IA in OA Number 49 of 2025.pdf
5761K

Sunit Kumar

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

IA No. 36 /2026

IN

ORIGINAL APPLICATION NO. 49 OF 2025/EZ

In the Matter of :-

Manbodh Kumar' _____ Applicant

Versus

State of Bihar & Ors. _____ Respondents

MEMO OF PARTIES

Manbodh Kumar, Resident of Nasriganj, Danapur, Ward No. 34, Patna, Bihar
– 800012. **... Applicant**

Versus

1. State of Bihar, through the Chief Secretary, having its address at Main Secretariat, Patna, Bihar – 800015, Email: cs-bihar@nic.in
2. Bihar State Pollution Control Board, Through the Member Secretary, Parivesh Bhawan, Plot No. NS-B/2, Patliputra Industrial Area, Patliputra, Patna– 800023, Email: membersecretarybspb-bih@gov.in, bspb@yahoo.com, Phone: 0612-2266155
3. District Magistrate, Patna, District Magistrate Office, Collectorate Campus, Patna, Bihar – 800001, Email: dm-patna-bih@nic.in, Phone: 6122219180
4. Senior Superintendent of Police, Patna, Police Office of SSP, Gandhi Maidan, Patna – 800001, Email: ssp-patna-bih@gov.in, Phone: 6122219883
5. Divisional Forest Officer, Patna Forest Division, having address at Divisional Forest Office Bailey Road, Patna – 800001. Email: dfopatnafdivision@gmail.com, Phone: 6122235212

Sunit Kumar

6. Directorate of Industries, represented through its Director, District Industries Office, Collectoratè Campus, Patna, Bihar – 800001. Email: dir.ind-bih@nic.in
7. Nagar Parishad Danapur Nizamat, Tikiyapara, Chittrakut Nagar, Danapur Nizamat, Patna – 800012, Email: 938644@gmail.com.
8. Sub-Divisional Officer, Danapur, Sub-Divisional Office, Danapur, Patna – 801503, Email: sdo-danapur-bih@nic.in, Phone: +91-612-2321970.
9. In-Charge Police Officer, Danapur Police Station, Danapur, Patna – 801503, Email: danapurcity@gmail.com, Phone: +91-612-2219570.
10. Central Pollution Control Board, through its Member Secretary, Parivesh Bhawan, East Arjun Nagar, Delhi – 110032. Email: ms.cpcb@gov.in, Phone: 011-43102030.
11. Bholam Ram Steels Pvt. Ltd, Through its Director Nasriganj, Danapur, Patna – 800012, Email: enquiry@bholaramsteels.com, info@bholaramsteel.com, Phone: 0612-2219801
12. Gupta Nutrition Pvt. Ltd., represented through its Director, having address at Nasriganj, Danapur, Patna – 800012. Email: info@guptanutritions@gmail.com, Phone: +91-612-2219802
13. M.S.B. Polymers, Gupta, Mohalla – Nasriganj, Danapur, Patna – 800012, Email: info@msbpolymers.com, Phone: +91-612-2319808
14. Sai Nath Biscuit Factory, Nasriganj Biscuit Factory Road, Mohalla – Nasriganj, Ward No. 34, Post Office – Digha, P.S. – Danapur, District – Patna – 800012. Mobile: 9334089223 (Rangid Kumar) Mobile: 9234369683 (Ajit Pandey)
15. M/s R.K. Traders, Nasriganj, Biscuit Factory Road, Mohalla – Nasriganj, Ward No. 33, Post Office – Digha, P.S. – Danapur, District – Patna – 800012. Email: info@rktraders.com, Mobile: 9304026633 (Ranjeet Kumar Sah) Mobile: 7256926588 (Nawlesh Kumar Sah)

... Respondents

THE HUMBLE APPLICATION OF THE APPLICANT ABOVE NAMED

Sunit Kumar

BEFORE THE NATIONAL GREEN TRIBUNAL EASTERN
ZONE BENCH,

IA No. _____/2026

IN

Original Application No.49/2025/EZ

In the Matter of :-

Manbodh Kumar _____ Applicant

Versus

State of Bihar & Ors. . _____ Respondents

INDEX

Sl. No	Particulars	Page Number
1.	An Interlocutory Application on behalf of the Applicant	1 ~ 8
2.	Vakalatnama	

Sunit Kumar (Adv)

BEFORE THE NATIONAL GREEN TRIBUNAL EASTERN
ZONE BENCH,

IA No. _____/2026

IN

*Filed through,
Sunit Kumar (Adv)
AOR-7538
EN No - BR/124/2017
11/05/2016*

Original Application No.49/2025/EZ

In the Matter of :-

Manbodh Kumar _____ Applicant

Versus

State of Bihar & Ors. _____ Respondents

*P-1-8
A
EMC
Ramon
11B76*

INTERLOCUTORY APPLICATION

(For taking correct addresses of Respondent Nos. 14 & 15 on record and for re-issuance of notice)

To,

The Hon'ble Members of the National Green Tribunal,
Eastern Zone Bench at Kolkata.

The humble Interlocutory
application of the
Applicant above named:



Sunit Kumar



MOST RESPECTFULLY SHEWETH:

1. That the present Original Application has been filed by the Applicant before this Hon'ble Tribunal raising issues relating to environmental violations and illegal activities affecting the environment in the concerned locality.
2. That Respondent Nos. 14 and 15 are necessary parties to the present proceedings as the issues involved in the Original Application directly concern their activities and therefore their presence is essential for effective adjudication of the matter.
3. That this Hon'ble Tribunal, while hearing the matter on 17.01.2026, was pleased to observe that the affidavit of service with respect to Respondent Nos. 14 and 15 had not been filed and accordingly directed the Applicant to take appropriate steps for service upon the said respondents and file affidavit of service within the stipulated period.
4. That earlier notice dated 03.04.2025 issued in the present matter could not be served upon Respondent Nos. 14 and 15 due to incorrect / incomplete addresses available at that time.

Sumit Kumar

5. That the earlier counsel engaged by the Applicant, on account of certain personal difficulties, has discontinued their involvement in the matter as a result, the Applicant is unable to produce a copy of the earlier service report, as the same is not available in the Applicant's possession.
6. That the Applicant has now obtained the present and correct addresses of Respondent Nos. 14 and 15, which are necessary for proper service of notice in the present proceedings.
7. That in order to comply with the directions of this Hon'ble Tribunal, it is necessary that the present and correct addresses of Respondent Nos. 14 and 15 be taken on record and incorporated in the party position of the Original Application.
8. That the correct addresses of Respondent Nos. 14 and 15 are as follows:
 - I. **Respondent No. 14**, Sai Nath Biscuit Factory, Nasriganj Biscuit Factory Road, Mohalla – Nasriganj, Ward No. 34, Post Office – Digha, P.S. – Danapur, District – Patna, Pin Code – 800012, Bihar.
 - II. **Respondent No. 15**, M/s R.K. Traders, Nasriganj, Biscuit Factory Road, Mohalla – Nasriganj, Ward No.

Smit Kumar

33, Post Office – Digha, P.S. – Danapur, District – Patna, Pin Code – 800012, Bihar.

8. That upon incorporation of the aforesaid correct addresses, the Applicant shall issue fresh notices to Respondent Nos. 14 and 15 and shall thereafter file affidavit of service along with proof of service in compliance with the order dated 17.01.2026.
9. That the present Interlocutory Application is being filed bona fide and in the interest of justice to ensure proper service of notice upon the concerned respondents so that the matter may be adjudicated on merits.
10. That no prejudice shall be caused to any of the parties if the present application is allowed, whereas grave prejudice may be caused to the Applicant if the correct addresses are not taken on record and fresh notices are not issued.
11. That it is most respectfully submitted that the earlier counsel engaged by the Applicant has, due to certain personal difficulties, stopped taking interest in the matter and despite best efforts the Applicant has not been able to contact him. In these circumstances, the Applicant is constrained to engage the undersigned counsel and is filing a fresh

4/1/2026

Vakalatnama along with the present Interlocutory Application for proper representation and prosecution of the case before this Hon'ble Tribunal.

It is most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:

- i. Take on record the present and correct addresses of Respondent Nos. 14 and 15 and incorporate the same in the party position of the Original Application;
- ii. Permit issuance/re-issuance of notice to Respondent Nos. 14 and 15 at the aforesaid addresses; and
- iii. Pass such other order or direction as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.

AND FOR THIS THE APPLICANT SHALL EVER PRAY.

5-
(Yunit Khanna V (Adv))

VERIFICATION

I,

MAN BODHI KUMAR S/O MANGAL RAY RO
NAS RIGANJ DANAPUR PO DIGWA PS DANAPUR

of PA TNA do hereby solemnly affirm and state as follows
do hereby verify that the contents of para nos. 1 to 11 are true on
legal advice and that I have not suppressed, any material fact.

MAN BODHI KUMAR

Signature of the Deponent

Place :- DANAPUR

Date :- 11-3-2026

Sumit Kumar (Adv)

Signature of the Advocate

भारत सरकार

Government of India

मनबोध कुमार

Manbodh Kumar

जन्म तिथि / DOB : 12/08/1985

पुरुष / Male



7130 1646 5054

मेरा आधार, मेरी पहचान

-8-



भारतीय विशिष्ट पहचान अधिकरण

Unique Identification Authority of India

पता:

आत्मज: मंगल राय, नजदीक संत
डॉमिनिक स्कूल, नासरीगंज, दानापुर,
दीघा, पटना, दीघा, बिहार, 800012

Address:

S/O: Mangal Ray, Near st Dominic
School, Nasriganj, Danapur,
Digha, Patna, Digha, Bihar,
800012

7130 1646 5054



1947



help@uidai.gov.in



www.uidai.gov.in

MANBODH KUMAR

Sunil Kumar (Adm)

8



VAKALATANAMA FOR THE APPLICANT
BEFORE THE NATIONAL GREEN TRIBUNAL

Eastern Zone Bench, Kolkata

O.A. No. 49/2025/EZ



Manbodh Kumar

Applicant

Versus

State of Bihar & Ors.

Respondents

KNOW ALL to whom these presents shall come that

I/We MANBODH KUMAR, Male, aged about 50 years, s/o - Mangal Ray, Resident of -
New St Dominic School, Nasirganj, Digha, Danapur, Patna-12, Appellant(s)/Petitioner(s)/Respon
dent(s)/Opposite party(ies) in the aforementioned case do hereby appoint and retain:-

1. Mr. SIDDHARTHA PRASAD, Enrl No. 2948/2005, M.P. Sinha Road, Kadamkuan, Patna-800003.
2. Mr. SUNIT KUMAR, Enrl. No. BR/124/2017, Sundar Nagar, Lohiopath, Patna-800014.

1. To act, appear and plead in the above-noted case in this Tribunal or in any other Court in which the same may be tried or heard and also in the appellate Court including the High Court, subject to payment of fees separately for each Court by me/us.
2. To sign, file, verify and present pleadings, appeals, cross-objections or petitions for execution, review, revision, withdrawal, compromise or other petitions or affidavits or documents as may be deemed necessary or proper for the prosecution of the said case in all its stages, subject to payment of fees for each stage.
3. To file and take back documents and to admit and/or deny the documents of the opposite party.
4. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
5. To take execution proceedings.
6. To deposit, draw and receive money, cheques or cash and grant receipts thereof and to do all other acts and things which may be necessary for the progress and in the course of the prosecution of the said case.
7. To appoint and instruct any other legal practitioner authorizing him to exercise the powers and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on my/our behalf.
8. And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts as if done by me/us to all intents and purposes.
9. And I/We undertake that I/We or my/our duly authorized agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.
10. And I/We the undersigned do hereby agree not to hold the Advocate or his substitute responsible for the result of the said case.
11. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself.
12. And I/We the undersigned hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. We hereby agree that once the fee is paid, we shall not be entitled to refund of the same in any case whatsoever and if the case prolongs for more than three years the original fee shall be payable again by me/us.

DATED THIS 11 DAY OF March 2026.

Received from the executant(s), satisfied and accepted as I hold no brief for the other side

Accepted as above

Siddhartha Prasad
Advocate

Sunit Kumar
Advocate

MANBODH KUMAR
Signature of Executant / Party

EN.No 2498/05
Mob:- 9934778779

EN.No - BR-124/2017

Mob:- 9334557807

Email - siddhartha.prasad
.2023@gmail.com

Email:- SUNIT.KUMAR99@GMAIL.COM