

**BEFORE THE NATIONAL GREEN TRIBUNAL EASTERN ZONE
BENCH, KOLKATA
ORIGINAL APPLICATION NO. 189/2025/EZ**

IN THE MATTER OF:

SAROJ KUMAR PATRA

...APPLICANT

VERSUS

STATE OF ODISHA & ORS.

...RESPONDENTS

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Through

Neelakshi
..

**Ms. NEELAKSHI BHADAURIA
(D/5653-A/2017) ADVOCATE FOR
RESPONDENTS NO. 2, AND 4
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Before Raghmani Patel
 Notary, Jharsuguda (Odisha)
 Regd. No. ON-06/97
 Sl.No. 35 Date. 29/04/26



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

ORIGINAL APPLICATION NO 189/2025 /EZ

IN THE MATTER OF:

Saroj Kumar Patra

versus

State of Odisha & Ors

SUPPLEMENTARY COUNTER AFFIDAVIT FILED ON BEHALF OF

RESPONDENT NOS . 2 AND 4

I, Sadakar Kumbhar, aged about 55 years, S/o- Balamani Kumbhar, presently serving as Tahsildar, Jharsuguda, being Respondent No. 4 in the present matter and also being the authorized and competent officer to swear this affidavit on behalf of Respondent No. 2, the District Collector, Jharsuguda, do hereby solemnly affirm and state as follows:

1. That I am the Tahsildar, Jharsuguda (i.e. Respondent No. 4), in the captioned Original Application and have gone through the contents and purport thereof and have filed this Counter Affidavit for the proper and effective adjudication of this case. The present counter affidavit is also being filed on behalf of Respondent No. 2 in the above-captioned Original Application. The deponent is well conversant with the facts and records of the case, and the statements made herein are based on official records, field inspections, revenue records, and reports prepared in the discharge of statutory duties under applicable revenue and land laws.

Sadar Kumbhar
 Tahsildar
 JHARSUGUDA

PART OF AFFIDAVIT

R.M. Patel
 Notary, Jharsuguda
 Regd. No. ON-06/97

2. That the present Supplementary Affidavit is being filed in continuation of the earlier affidavit submitted before this Hon'ble Tribunal on 20th February 2026, with a view to clarify certain inadvertent errors in translation and interpretation of the report of the Revenue Inspector (RI), as referred to in Paragraph No. 5 of the earlier affidavit annexed therein as Annexure-A/2. The correct translation is now attached against original affidavit page No.232 as **Annexure A/2R**.
3. That, it is respectfully submitted that the Annexure attached with the Para 5 earlier vide **Annexure-A/2** may be replaced with the recent copy as the previous translation was inadvertently typographical error made during the translation of "filed enquiry report vide letter No. 347 dated 12.12.2025", from local language to English.
4. That I have read over the content of the accompanying Reply, and the same has been drafted as per my instructions. The contents of the said Reply are true and correct to the best of my knowledge.

Identified by

Advocate

Sunil Kumar Sahu
B.A LL.B
Advocate, Jharsuguda
Regd. No. O-418/2001

VERIFICATION

Verified at Jharsuguda on the 29/4/26 day of 2026 that the contents of paragraph 1 to 5 of my above Affidavit are true and correct and no part of it is false and nothing material has been concealed therefrom.

AFFIDAVIT

The above deponent being personally known to me appears before me on 29/4/26 and states on oath that the contents of the affidavit are true to the best of his knowledge based on official records.

✓ **Sadakar Kumbhar**
 Deponent
 Tahasildar
JHARSUGUDA

✓ **Sadakar Kumbhar**
 Deponent
 Tahasildar
JHARSUGUDA

✓ **Sadakar Kumbhar**
 Deponent
 Tahasildar
JHARSUGUDA

R.M. Patel 26/4/26
 Notary, Jharsuguda
 Regd. No. ON-06/97
 Mob:- 9861018602

Annexure-A/2R

CORRECT ENGLISH TRANSLATION OF LETTER ANNEXURE-A/2.
Office of the Revenue Inspector, Badamal
Letter No.347 Dt.12.12.2025

To,
 The Tahasildar,
 Jharsuguda.

Sub- Investigation Report regarding the complaint of Illegal construction on Govt. land by M/S Epsilon Carbon Ashoka Pvt. Ltd situated in Mouza Sripura.

Ref- 1. Tahasil Office, Jharsuguda Letter No: 6644 Dt.14.10.2025
 2. Tahasil Office, Jharsuguda Letter No.6791 Dt.22.10.2025.

Sir,

On 12.12.2025, on the complaint of the District Collector, Jharsuguda, registration number DM20251382317 dated 18.10.2025 and on the instructions of the Tehsildar, Jharsuguda, a land survey was conducted on the Kachha road connecting M/S.Epsilon Carbon Ashoka Pvt Ltd, Sripura with the main road mentioned in the complaint. During the investigation, it was found that the road connecting the said company passes through Khata No. 178 (Rakhit), Plot No. 455 Kisam – Gramya Jangal, Plot No. 431 Kisam - Gochar, Plot No. 427 Kisam- Gramya Jangal, Khata No. 182 (South Eastern Railway), Plot No. 373 Kisam - Railway, and Khata No. 115 (R. T. Devaki Nayak P: Muktiswar Padhi & Others), Plot No. 432 Kisam – AA. SA., connecting to the main gate of the company.

The said road is presently not in uniform width and it is now approximately 25 to 30 feet wide. Earlier, it was narrower, and during the investigation, the the respectable villagers present in the sport stated that the company had widened the road by dumping industrial waste.

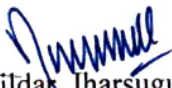
At present, industrial waste is lying on the roadside, however, no documents regarding the original length and width of the road are available in this office. Therefore, this is submitted for your kind consideration and for taking necessary action.

Yours faithfully,

-Sd-

Revenue Inspector,
 Badmal, Jharsuguda

Certified that the above letter has been translated from Odia version to English version vide Letter No- 347/ Dtd. 12.12.2025 submitted by the Revenue Inspector, Badmal


 Tahasildar, Jharsuguda
Tahasildar
JHARSUGUDA