

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE
BENCH AT CHENNAI**

O.A No. 19 of 2023

Between

KOTARI MURALIDHAR BABU

H.No. 1-7, Kappaladoddi village
Guduru Mandalam, Machilipatnam District
Andhra Pradesh-521366
Mobile No. 9010472345
Mail id: muraliithire@gmail.com

... Applicant

VERSUS

1. STATE OF ANDHRA PRADESH

Rep. by its Chief Secretary Secretariat,
Velagapudi, Guntur District
Andhra Pradesh-522503
Mail: cs@ap.gov.in and 9 others

...Respondents

**COUNTER AFFIDAVIT FILED BY THE 10th IMPLEADED
RESPONDENT SEIAA**

DATE-01-08-2023



**M/s MADHURI DONTI REDDY
ADVOCATE**

**STANDING COUNSEL FOR GOVERNMENT OF ANDHRA PRADESH
A.P. POLLUTION CONTROL BOARD
T.T.D. SUPREME COURT OF INDIA**

#26, S2, Royal Castle, Gill Nagar Extension, Choolaimedu, Chennai – 600 094.
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COUNSEL FOR 10TH Respondent

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It is certified that all the documents contained in the above annexure are true copies.

Date: 01.05.2023

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1. STATE OF ANDHRA PRADESH

Rep. by its Chief Secretary Secretariat,

Velagapudi, Guntur District

Andhra Pradesh-522503

Mail: cs@ap.gov.in

2. STATE OF ANDHRA PRADESH

Rep. by its Principal Secretary

Department of Mines and Geology Secretariat,

Velagapudi, Guntur District

Andhra Pradesh-522503

Mail: directormines@yahoo.co.in

Phone: 08662882170.

3. UNION OF INDIA

Through its Secretary. Ministry of Environment, Forest & CC

Indira Priyadarshini Bhavan, Jorbagh,

New Delhi-110003

Mail: secy-moef@nic.in

Phone: 011-24695262, 24695265

4. ANDHRA PRADESH POLLUTION CONTROL BOARD

Rep. by its Member Secretary

D.No. 33-26-14/D2, Near Sunrise Hospital,

Pushpa Hotel Center, Chalamvari Street,

Kasturibaipet Vijayawada, Andhra Pradesh-520010,

Mail:membersecy@appcb.gov.in,086624 63202

5. ANDHRA PRADESH SPECIAL ENFORCEMENT BUREAU (LIQUOR & SAND)

Rep. its Director General of Police/Ex

Officio Chief Secretary/Commissioner

Andhra Pradesh Police Head Quarters

Mangalagiri, Guntur District, AP-522502

Mail: dgp@appolice.gov.in Phone: 0863-2340445

6. DISTRICT COLLECTOR AND MAGISTRATE

Krishna District

Andhra Pradesh-521366

Mail: collector_krsn@ap.gov.in

Phone: 08672252668

7. REVENUE DIVISIONAL OFFICER

Machilipatnam,

Krishna District

Andhra Pradesh-521366

Mail: collector_krsn@ap.gov.in

8. KARUMANCHI KAMESWARA RAO

Village Dodlapalem

Andhra Pradesh

Guduru Mandal, Krishna

9. RAJULAPATI SRINIVAS

Vuyyuru, Krishna District

Andhra Pradesh

10. STATE ENVIRONMENT IMPACT ASSESSMENT AUTHORITY.

Rep. by its Member Secretary
D.No.33-26-14 D/2, Near Sunrise
Hospital, Pushpa Hotel center,
ChalamavariStreet,Kasturibaipet, Vijayawada-520010
membersecy@appcb.gov.in, Ph.08662463202

ORDER DATED 17-3-2023) IMPLEADED RESPONDENT

...Respondents

**COUNTER AFFIDAVIT FILED BY THE 10th IMPLEADED
RESPONDENT SEIAA**

I, Dr. P.V.Chalapathi Rao, son of Pasala Lakshmaiah, aged 54 years, Member Secretary, AP State Environment Impact Assessment Authority, Vijayawada do hereby solemnly and sincerely affirm and state as follows:

1. I am the 10th Impleaded Respondent herein and as such I am well acquainted with the facts of the case.
2. This respondent denies each averment made in the affidavit filed in support of the appeal as false and incorrect except those that are specifically admitted herein in this counter affidavit.
3. With regard to the averments made in paragraphs 1 to 4 of the Most Respectfully Showeth in O.A is not related to this respondent and hence there are no remarks.
4. With regard to the averments made in paragraph 1 of the Facts In Brief in O.A is not related to this respondent and hence there are no remarks.
5. With regard averments made in paragraph 2 of the Facts In Brief in **O.A** is true that the SEIAA has not issued any Environmental Clearances on that particular area in Sy.No. 87-1,87-2A,88-2,86-1A,88-4A,88-4B,65-5A,65-5B,68-2b,95-2,85-1A,89-3B and adjoining agriculture lands in kappaladoddi village of Gudur mandal in Krishna District of Andhra Pradesh.

6. With regard to the averments made in paragraph 3 to 8 of the Facts In Brief in O.A is not related to this respondent and hence there are no remarks.
7. It is submitted that this respondent craves leave of this Hon'ble Tribunal to raise additional counter in the course of proceedings, if required.

In the above circumstances, it is humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the above the O.A No. 19 of 2023 and pass such further or other orders, as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case and thus render justice.

Solemnly affirmed Vijayawada
Andhra Pradesh on
this the 1st day of May 2023
and signed his name in my presence

}


Member Secretary
SEIAA, AP

VERIFICATION

I, Dr. P.V.Chalapathi Rao S/o Pasala Lakshmaiah, Aged about 54 years, Member Secretary, AP State Environment Impact Assessment Authority, Andhra Pradesh do hereby verify that the contents of Para's of Counter Affidavit are based on record and information are true to the best of my knowledge and belief.

Hence, verified on the 1st day of May 2023 at Vijayawada


DEPONENT
Member Secretary
SEIAA, AP