

BEFORE THE NATIONAL GREEN TRIBUNAL: SOUTH ZONE BENCH, CHENNAI.

ORIGINAL APPLICATION NO. 17/2022/SZ

PERMANDLLA KIRAN KUMAR

...APPLICANT

VS.

THE STATE OF TELANGANA & 13 OTHERS

...RESPONDENTS

ADDITIONAL REPLY AFFIDAVIT FILED ON EBHALF OF THE RESPONDENTS

NO.12 TO 14 15

I, A.Somi Reddy S/o Sambhi Reddy, Aged 45 years, Occ: Business, R/o Vokshith Enclave, Gajularamaram, Shapurnagar, Jeedimetla, Hyderabad-500055, do hereby solemnly affirm and sincerely state as follows:

1. I submit that I am the 14th Respondent in the above O.A. and as such I am well acquainted with the facts of the case and I am filing this reply on my behalf and also on behalf of the Respondents No.12 and 13 also.
2. I submit that we these Respondents are only builders of the apartment/villa/houses. I submit that we have impleaded in this OA unnecessarily and with a malafide motive to cause mental harassment to us.
3. I submit that we have filed their respective Reply/counters statement in the above OA as early as in 2023 and this additional reply is filed in addition to the already filed reply/counter.

A.Somi Reddy

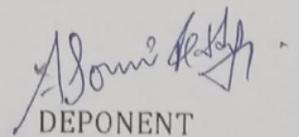
4. I submit that we have not constructed any house / apartment that belongs to the forest land or on any water bodies. I submit that the Residential houses are developed by us only in Survey No. 98A, 98AA.
5. I submit that we are into the business of Real Estate promotion of Land and Building layouts and construction. I submit that during the course of their said business have developed and promoted a layout of lands comprised in Survey No. 14, 15, 28 and 445 situated at Gajularamaram Village, Quthbullapur Mandal, Medchal-Malkajgiri District, Hyderabad, Telangana State.
6. The said properties comprised in the said survey numbers are owned by the individual owners who have acquired and /or possessed either through the absolute sale deed or as ancestral. The lands that were developed by the Respondents are completely covered only in Survey No. 14 & 15. The said properties are Patta land and the same has got nothing to do with the forest lands which are actually covered under Survey No. 19.
7. I submit that we have not tampered the boundaries of forest land and the natural Nala from Pedda Cheruvu to Parki Cheruvu.
8. I submit that the Petitioner's complaint is only as against the land in Survey Number 19 to an extent of 471.14 Acres which belongs to the forest land.
9. I submit that we have not put up any construction on the Forest land and in this regard I file herewith the photographs of the Residential houses

A. Ganji Reddy

promoted by us and the supporting planning permission and the reply received from the various authorities in this regard. The forest land in Sy.No.19 is properly fenced and boundary pillars are fixed about more than 40 years ago. The photographs enclosed could clearly establish the same. It is pertinent to submit that pursuant to the orders of this Hon'ble Tribunal, dated 11-02-2022, a joint survey was conducted by Forest, Revenue, Survey & Land Records authorities and panchanama was prepared in Sy.No.19 of Gajularamaram village, Quthbullapur Mandal, Medchal-Malkajgiri District (Erstwhile Ranga Reddy District). On perusal of the panchanama and the sketch map, it clearly reveals that there is no encroachment into the land of the Forest at all.

In the foregoing, I humbly pray that this Hon'ble Tribunal may be pleased to dismiss the OA filed by the Applicant and pass such further or other orders as this Hon'ble Tribunal may deem fit and proper and thus render Justice.

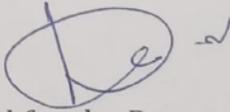
Sworn and signed by before me
on this the 16th day of February, 2024
at Hyderabad.


DEPONENT

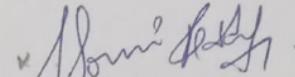
Advocate/Hyderabad

VERIFICATION

I, A.Somi Reddy S/o Sambhi Reddy, Aged 45 years, Occ: Business, R/o Vokshith Enclave, Gajularamaram, Shapurnagar, Jeedimetla, Hyderabad-500055, do hereby verify that what is stated in the above paragraphs are true to the knowledge, belief and information. On this the 16th day of February, 2024.



Counsel for the Respondents No.12 to 14



DEPONENT

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BEHALF OF THE RESPONDENTS NO.13 TO

14/15

FILED ON : 20-02-2024

FILED BY :

Counsel for the Respondents No.12 to 14