

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL ZONAL BENCH  
AT BHOPAL (M.P.)

INTERLOCUTORY APPLICATION No. **146**/2024

IN

ORIGINAL APPLICATION NO. **260**/2024

HEMRAJ MEENA

VERSUS

UNION OF INDIA AND OTHERS

PAPER BOOK INDEX

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1.	Interlocutory Application with affidavit.	1-3

*10/8/895/2000*  
COUNSEL FOR THE APPLICANT

(Krishan Sharma)

Advocate

Mob- 9982765049

Email- [advocatekrishana@gmail.com](mailto:advocatekrishana@gmail.com)

*Hemraj Meena*

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL ZONAL BENCH  
AT BHOPAL (M.P.)

INTERLOCUTORY APPLICATION No. ....../2024

IN **146**

ORIGINAL APPLICATION NO. 260/2024

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INTERLOCUTORY APPLICATION FOR STAYING THE CONSTRUCTION  
ACTIVITIES AND OPERATION OF IMPUGNED COMMERCIAL  
ESTABLISHMENT/RESORT DURING THE PENDECY OF ORIGINAL  
APPLICATION.

MOST RESPECTFULLY SHOWETH:

That Applicant is submitting Instant Interlocutory Application as under-

1. That Applicant has filed this original application regarding illegal construction activities of Commercial Nature in Nahargarh Wildlife Sanctuary and its Eco Sensitive Zone without there being any requisite permission from National Wildlife Board, Forest Department, Central Ground Water Authority and Rajasthan State Pollution Control Board and Applicant has all the hopes to get success in original application.
2. That Prima Facie case is well proved in favour of applicant and also balance of convenience lies in favour of applicant and if stay is granted in favour of applicant then it would be in favour of environment.
3. That in order to avoid the repetitions the facts and grounds taken in the Original Application be treated part and parcel of this Interlocutory Application.
4. That private respondent is carrying on the construction rapidly and if same is not stopped then huge injustice would be caused to the applicant and purposes of filling of Original Application would be frustrated.
5. That other grounds shall be urged at the time hearing of present application.

Hemraj Meena 

## PRAYER

It is therefore most respectfully prayed that present I.A. may kindly be allowed and Private Respondent be restrained from carrying on further construction within the periphery of Nahargarh Wildlife Sanctuary and its Eco Sensitive Zone more particularly upon Khasra No's 14, 1439/9159, 757, 758, 760, 761, 762, 779, 780 and 781 measuring 2.58 Hectare situated at Village Amer and he may be further restrained from carrying on any other activity upon said land and Respondents be further directed to ensure compliance of environmental norms during the pendency of Original Application in the interest of Justice.

Date- 04/12/2024

Place- Bhopal

Hemraj Meena

Humble Applicant

Through Counsel

(Krishan Sharma)

Advocate

Mob- 9982765049

Email- [advocatekrishana@gmail.com](mailto:advocatekrishana@gmail.com)

Hemraj Meena

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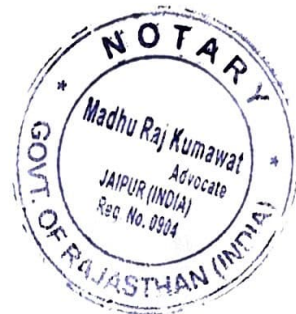
IN

ORIGINAL APPLICATION NO. **260**/2024

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MADHU RAJKUMAWAT  
Reg. No. 0904 Notary & Advocate  
38 Ka 8, Jyoti Nagar Housing  
Board Colony Near New  
Vidhan Sabha, Jaipur (Raj.)  
Comm. Exp. on 25 June 2028  
madhukumawat63@gmail.com  
Mo, 9352449122, 7597202140

AFFIDAVIT IN SUPPORT OF TO I.A.

I, Hemraj Meena son of Shri Ramphool Meena, aged about 40 years, resident of 134/20-A Defence Colony, Gurjar Ghati Amer Road Jaipur, (Rajasthan), do hereby take oath and state as under: -

1. That I am applicant in this case and am well conversant with the facts and circumstances of the case.
2. That averments of facts and ground of the annexed I.A. are true and correct, which I believe to be true and correct on the basis of my personal knowledge.

Identified by  
1 Dec 4 DEC 2024

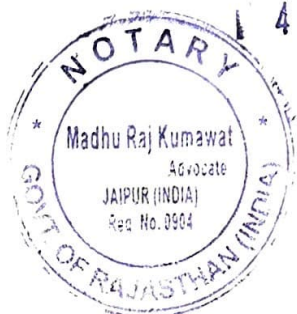
ATTESTED  
Hemraj Meena  
NOTARY  
JAIPUR (RAJ.) INDIA

Hemraj Meena  
DEPONENT

VERIFICATION

I, above named deponent, do hereby verify that contents of para no.1 to 2 of the above affidavit are true & correct to my personal knowledge. Nothing material has been concealed and no part of it is false. SO HELP ME GOD.

Hemraj Meena  
DEPONENT



4 DEC 2024

ATTESTED  
Hemraj Meena  
NOTARY  
JAIPUR (RAJ.) INDIA