

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

\*\*\*

Original Application No.97/2022

Kamal Tiwari

**Versus**

Union of India and Others

(Reply on behalf of the  
Respondent No.10 Managing  
Director Jaipur Discom)

**MOST RESPECTFULLY SHOWETH**

The humble replying Respondent No.10  
submits as under: -

1. That the contents of this Para of the Original Application are formal hence requires no reply.
2. That the contents of this Para of the Original Application are formal hence requires no reply.
3. That the contents of this Para of the Original Application are not related with the replying respondent hence

*[Handwritten Signature]*

need no reply. It is further state that Even though no specific prayer is against replying respondent number 10. Prayer of the petitioner before the Hon'ble Tribunal is that to stop of non-forest illegal activities and constructions upon the forest land of khasra number 3 and khasra number 10.

**REPLY TO FACTS IN BRIEF WITH GROUNDS**

1. That the contents of this Para (1) of the Original Application are not directly or indirectly related with the replying respondent hence need no reply.
2. That the contents of this Para (2) of the Original Application are not directly or indirectly related with the replying respondent hence need no reply.

*[Handwritten signature]*

3. That the contents of this Para (3) of the Original Application are not directly or indirectly related with the replying respondent hence need no reply.
4. That the contents of this Para (4) of the Original Application are not directly or indirectly related with the replying respondent hence need no reply.
5. That the contents of this Para (5) of the Original Application are not directly or indirectly related with the replying respondent hence need no reply.
6. That the contents of this Para (6) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.

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7. That the contents of this Para (7) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.
8. That the contents of this Para (8) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.
9. That the contents of this Para (9) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.
10. That the contents of this Para (10) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.

*Chad*

11. That the contents of this Para (11) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.

12. That the contents of this Para (12) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.

13. That the contents of this Para (13) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.

14. That the contents of this Para (14) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.

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15. That the contents of this Para (15) of the Original Application are not directly or indirectly related with the humble respondent hence needs no reply.
16. That the contents of this Para (16) of the Original Application are not directly or indirectly with humble respondents hence needs no reply
17. That the contents of this Para (17) of the Original Application are not directly or indirectly related with the respondent hence needs no reply.
18. That the contents of this Para (18) of the Original Application are not directly or indirectly related with the respondent hence needs no reply. Even though no registered notice dated **31/10/2022 (Annexure-18)** is sent to the replying respondent and no name is

*Handwritten signature*

in the mentioned in the registered notice.

19. That the contents of this Para (19) of the Original Application are not directly or indirectly related with the respondent hence needs no reply.

**LIMITATION:**

That the contents of this Para relate with filing of the present petition with limitation which is a legal ground as it is discretion of the Hon'ble Tribunal to allow or not.

**PRAYER:**

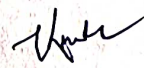
It is, therefore, most humbly prayed that aforementioned reply may kindly be accept and taken on the record and accordingly Original Application filed by the Applicant may kindly be dismissed with costs.

Further petitioner has not made any allegations against replying respondents No.10) in whole original application and

*Handwritten signature*

further no relief has been claimed against them so it is requested that Original Application filed by the Applicant may kindly be dismissed against replying respondents with costs.

Any other order or direction this Hon'ble Court may deem fit and proper be also passed in favor of respondents.

  
Humble Respondent No 10  
Through Officer Incharge

Through Counsel

  
(Shiv Narayan Bohra)

Advocate

R/465/1994

Mobile: 9414074734

email: [advocatesnbohra1969@gmail.com](mailto:advocatesnbohra1969@gmail.com)

Res: G-1,134/135 Parshavnath Colony,  
Nirman Nagar, Jaipur (Rajasthan) -302019

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AFFIDAVIT IN SUPPORT OF REPLY

I, Harish Chandra Mangal s/o Shri H.D.Mangal age 57 years, Working as Executive Engineer CD 5 Jaipur Vidyut Vitran Nigam Limited do hereby take oath and state as under:-

1. That I have been appointed as Officer In charge on behalf of the Respondents for filing reply in the present case and therefore I am well conversant with the facts and circumstances of the case and am competent to swear this affidavit.
2. That I have gone through and fully understood the averments made in the

*Harish*

annexed reply, which counsel has drafted under my instructions.

3. That the factual contents of the annexed reply are true and correct to my personal knowledge based on office record and legal averments made therein are believed by me to be true and correct on the basis of legal advice tendered to me by the counsel.

  
(Deponent)

VERIFICATION

I, the above-named Deponent do hereby verify that the aforesaid affidavit is true and correct to the best of my knowledge, belief and I have not suppressed any material therein, so help me GOD.

  
(Deponent)

**VAKALATNAMA****BEFORE THE NATIONAL GREEN TRIBUNAL ZONAL BENCH AT BHOPAL (M.P)****ORIGINAL APPLICATION NO. 97/2022.****KAMAL TIWARI****VERSUS****UNION OF INDIA AND OTHERS.**

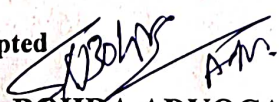
KNOW ALL MEN by these presents that I/we undersigned HARISH CHAND MANGAL EXEUCIVE ENGINEER CD (V) JAIPUR VIDYUT VITRAN NIGAM ITD, JAIPUR.

.....  
 .in the above case do hereby make, constitute and appoint **SHRI S.N. BOHRA, R/465/1994** my/our true and lawful attorneys, for me/us in my/our name, and on my/our behalf to appear plead and act in the said case and more particularly to draw, make present, withdraw, amend, represent and verify petition, plaints or written statements and to make, present applications or petitions in the court, to present, withdraw and receive documents and any money from the Court or from the opposite party either in execution of the decree or otherwise, and on receipt of payment thereof to sign and deliver for me/us proper receipts and discharge from the same, to compromise or to refer the case to arbitration, to seek execution of the decree or any orders in the case, to draw, to make present, withdraw, amend and represent any memorandum of appeal or cross objections in any appeal arising or to seek reviews or revision of any Judgment, decree or order in the case, to appear, conduct and plead in all such writ/appeals/revisions and reviews and to do all other lawful acts and things as effectually as I/We could do the same whether being personally present or otherwise, My/Our said counsel is/are also hereby authorized and personally present or otherwise, My/our said counsel is/are also hereby authorized and empowered to instruct, engage or appoint any other counsel to appear, please and act with or for him/them in his/their absence or otherwise as my/our said counsel may think proper to do so, all acts of such counsel or counsel shall be equally and similarly binding on me/us as if done by my/our said counsel and as if done by me/us personally.

I/We hereby agree that if any part of the said counsel's fee remains unpaid before the first hearing of the case, or if any hearing of the case be fixed on tour or at any other place except the usual court premises, then my/our said counsel will not be bound to appear before the court. The counsel's fee now settled and agreed to be in respect of this Court and for the pending proceedings only. Any fresh action hereafter taken will entitle the counsel to fresh fees. I/We also agree that if the case be dismissed in default or if it be proceeded ex-parte under any circumstances whatsoever the said counsel shall not be held responsible for the same and all whatsoever my/our said counsel shall do in connection with the said case, I/We do hereby agree to ratify and confirm. Any costs awarded in the case at any time in my/our favour shall form part of the counsel's claim and shall be payable to him/them in addition to his/their fees in the case.

IN WITNESS WHEREOF I/We have hereto set my/our hand(s) at \_\_\_\_\_ this  
 \_\_\_\_\_ day of \_\_\_\_\_ and delivered to the said counsel (s).

Accepted

  
**S. N. BOHRA ADVOCATE**  
**R/465/1994, Mob. 9414074734**  
**E-mail:advocatesnbohra1969@gmail.com**  
**Address: Flat No. G-1, Plot No. 134-135,**  
**Parshavnath Colony, Nirman Nagar,**  
**Jaipur-302019 (Raj.)**

1. 

2. \_\_\_\_\_

3. \_\_\_\_\_