

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

O.A. NO. 29 OF 2020 (SZ)

IN THE MATTER OF:

SAJIMON SALIM

Kinartinkarayil House, Kumily P.O.
Idukki, Kerala – 685 509.

...APPLICANT

v.

UNION OF INDIA

Ministry of Environment and Forest,
Forest Conservation Division, Government of India,
3rd Floor, Prithvi Wing,
Indira Parvayaran Bhawan, Jor Bagh,
New Delhi - 110003 & Others

...RESPONDENTS

REPLY STATEMENT FILED ON BEHALF OF THE 8TH RESPONDENT

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&

S.SARAVANAN

COUNSEL FOR 8TH RESPONDENT

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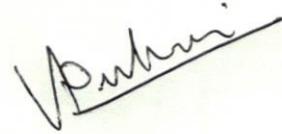
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Sl. No.	Date	Description	Page No
1.	22.10.2021	REPLY STATEMENT FILED ON BEHALF OF THE 8TH RESPONDENT	1-14

Dated at Chennai on this 22nd day of October, 2021



COUNSEL FOR 8TH RESPONDENT

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

Application No. 29 of 2020

Sajimon Salim
S/o. KA Salim,
Kinartinkarayil House, Kumily PO,
Idukki, Kerala 685 509.

...Applicant

Versus

1. Union of India
Ministry of Environment and Forest,
Forest Conservation Division, Government of India,
3rd Floor, Prithvi Wing,
Indira Parvayaran Bhawan, Jor Bagh, New Delhi – 110003.
2. State of Kerala,
Represented by its Chief Secretary to Government,
Government secretariat,
Thiruvananthapuram 695 001.
3. Conservator of Forests,
Kerala State,
Forest Headquarters, Vazhuthacaud,
Thiruvananthapuram.
4. The Deputy Director (Project Tiger)
Periyar East Division,
Periyar Tiger Reserve,
Thekkady,
Idukki District.
5. National Tiger Conservation Authority,
Government of India
Ministry of Environment and Forest, New Delhi
Rep. by its Secretary.
6. The Kerala State Pollution Control Board,
Rep. by its Member Secretary,
Thiruvananthapuram.
7. M/s.Periyar Tiger Conservation Foundation,
Rep. by its Trustee,
O/o. Deputy Director East Division,
Periyar Tiger Reserve, Thekkady, Idukki Dist.

Signed before me:

M. S. RAJESH
ADVOCATE, PUNALUR
Roll. No. K-1349.2007

8. T. Ajayan
S/o. Thankappan,
Nellickal House, Vanchivayal Tribal Colony,
Vallakkadavu P.O., Vandiperiyar,
Peermedu Thaluk, Idukki District,
Kerala - 685 533.

...Respondents

REPLY STATEMENT FILED ON BEHALF OF THE 8TH RESPONDENT

I, T.Ajayan, Son of Mr. Thankappan, aged about 47 years, residing at VanchivayalOoralali Tribal Colony, do hereby solemnly affirm and sincerely state as follows :-

1. I am the Ooru Moopan (Tribal Chief) of Vanchivayal Ooralali Tribal Colony, the 8th Respondent herein, Impleaded vide Order dated 21.09.2020, and as such I am well acquainted with the facts and circumstances of the case and competent to swear this affidavit.
2. I humbly submit that the present Original Application has been filed by the Applicant herein seeking the following relief:
 - "a) Declare the impugned construction at S.No.67/1, Periyar Village, Peerumedu Taluk as illegal,
 - b) Declare the Respondent authorities to restore the impugned part of the forest area,
 - c) Direct the Respondent authorities to plant trees and improve the environment of the area,
 - d) Direct the Respondent authorities to assess the damages, that had been caused due to illegal construction, and use the same in remediating the impugned area, and
 - e) Pass such further and other order/s as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the present case."

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Signed before me:
M. S. RAJESH
ADVOCATE, PUNALUR
Roll. No. K-1349-2000

3. I humbly submit that nothing contained in this Reply Statement shall be construed as an admission of any statement or averment made in the present Original Application, save and except what has specifically been admitted by the answering Respondent herein.
4. I humbly submit that the answering Respondent denies each and every averment, which is contrary to and/or inconsistent with what is stated in this statement, as if the same were specifically traversed.
5. I humbly submit that the instant Reply Statement is being filed in order to bring out the true and correct factual position and to specifically deal with the averments and allegations made by the Applicant in the instant Application. The answering Respondent reserves liberty to file a further Reply Statement and additional documents if the situation so necessitates at a later stage.
6. It is respectfully submitted that this Respondent herein is the representative of the residents of Vanchivayal Tribal Colony, located in the Vallakkadavu Range of Periyar Tiger Reserve, Kerala.
7. It is submitted that the primary allegation in the present application is that the Respondent authorities had started to convert a portion of the forest area at S.No. 67/1, Periyar Village, Peermedu Taluk, into a football ground.
8. It is submitted that the said open ground is not a part of the core area of Periyar Tiger Reserve. It is submitted that the impugned area forms part of the Vanchivayal tribal settlement and falls within the ambit of community forest resource as defined under the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 (hereinafter referred to as the Forest Rights Act, 2006). It is submitted that the Application is filed with an intent to strip-off the tribal community forming part of Vanchivayal tribal colony from the fundamental right to life and from various rights conferred on them especially under the Forest Rights Act, 2006.

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Signed before me,
M. S. RAJESH
ADVOCATE, PUNAJI
Roll No. K-1340-2000

9. It is respectfully submitted that the Vanchivayal Tribal Settlement is situated in Vallakadavu Range of Periyar Tiger Reserve East Division and is not forming part of the core zone of Periyar Tiger Reserve. It is inhabited by 76 number of Oorali families since 1940s and located inside the forests and around 3.5 km away from the nearby public road. Most of the families of the tribal colony earn their livelihood through organic agriculture, particularly the cultivation of pepper. Till two decades ago, they had been living in complete drudgery and penury and suffered heavily at the hands of middlemen till the Periyar Tiger Reserve management intervened through the constitution of a tribal eco-development committee (a participatory forest management institution at the grass root level) and supported the running of anganavadi, nursery school and other socio-cultural and economic activities of the tribal settlement. Through these interventions, the status of the tribal communities of the Vanchivayal colony has improved substantially and Vanchivayal tribal colony has been rated as the second best tribal settlement in the state of Kerala by the Government of Kerala in 2018-19.

10. It is respectfully submitted that the impugned open area, which has been alleged as a football ground in the instant Application, is an integral part of the Vanchivayal tribal settlement and is used by the members of the tribal community ever since its inception as a common gathering place for rituals, festivals, marriages, and as a playground of children studying in the anganavadi and also for the youth of the colony.

11. It is further submitted that the Vanchivayal tribal colony consists of three bits of settlements, one temple, anganwadi, maidanam (open ground), community hall, school, library and approach road. The open ground is a common gathering place ever since the establishment of the settlement, falling within the ambit of a community forest resource, and is surrounded by the houses of the Vanchivayal tribal colony and is an integral part of the Vanchivayal tribal colony. The fact that the open ground is forming part of the Vanchivayal tribal settlement is evident from the Google maps and the map prepared by the Forest Department as part of the Resource Use Microplan of

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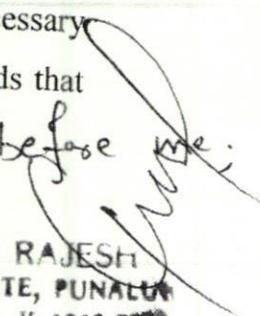
Signed before me:
M. S. RAJESH
ADVOCATE, PUNALAYAM
Roll No. K 1349 21/01

Forest Department. It is humbly submitted that any averment to the contrary that the open ground is forming part of the core area of Periyar Tiger Reserve is baseless, false and misleading.

12. It is respectfully submitted that the said open ground is the only area in the tribal colony to gather for festivals, to perform traditional practices, rituals and for the youth to hone their sports skills. The Government of Kerala delineated the Core/ Critical Tiger Habitats and Buffer areas of Periyar Tiger Reserve and Vanchivayal and Vanchivayal tribal settlements were included in the buffer area of Periyar Tiger Reserve and excluded from the Core/ Critical Tiger Habitat as per the Notification of Government of Kerala dated 6th April 2011. It is clear from the expression in the said Notification in Para 4 that '*Vanchivayal tribal settlement including 3 bits of settlement*'. As per the approved Tiger Conservation Plan of the Periyar Tiger Reserve, the total area of the three bits of tribal settlements in the Vanchivayal tribal settlements is **39.34 ha** whereas the total area of the tribal colony mentioned in the calculation of the buffer area comes to 50 ha. The additional **10.66 ha** is the area occupied by the community forest resources of the tribal colony included in the buffer area. It is submitted that it is thus evident that the Vanchivayal tribal colony comprises of three bits of settlements (**39.00 ha**) and the community forest resources- temple, anganwadi, maidanam (open ground), community hall, school, library and approach road (**10.00 ha**), thus forming a total area of **50.00 ha** is in the buffer area of the Tiger Reserve and not in the Core/ Critical Tiger Habitat of the Tiger Reserve. This is the only such place space available inside the settlement. The maintenance of the open space /ground was always the responsibility of the tribal community and this time also the same was done as always without the cutting of trees or increasing the extent. The road which connects two bits of settlement passes through the ground and it adds to the total area of the ground. In fact, during the mega floods of 2018 and 2019 that wreaked havoc in Kerala, this open space was badly damaged through accumulation of silt and it was this that was removed by the communities. This was also necessary for clearing the blockages in the road that was damaged in the disastrous floods that

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Signed before me:

 M. S. RAJESH
 ADVOCATE, PUNALAYAM
 Roll. No. K-1349-2000

passes through the middle of the open space/ ground and is the only connecting road between the tribal settlement and outside world.

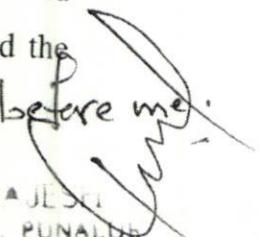
13. It is submitted that the Applicant has not mentioned the fact that the ground is a part of a tribal colony, which shows the insidious intentions of the Applicant. It is pertinent to note that being a native of nearby Kumily town, the Applicant is very much aware of this but deliberately suppresses this fact. His evil motives behind these strange omissions and additions is clear evidence that he is working against the interests of the Vanchivayal tribal community who already has a perilous existence inside the forests.

14. It is submitted that the road leading to Vanchivayal Tribal Settlement and Vanchivayal including the 3 bits tribal settlements are in the buffer area of the Tiger Reserve. Hence, the action of the tribal community in having engaged any mechanical measures to carry out the limited restoration works (without felling trees & expanding the area) that too to restore an area including the road to the settlement that was badly damaged in a the mega floods is fully justified. Moreover there is no legal restriction in adopting mechanical measures for carrying out a work that is humanely impossible to be carried out even if this in a tribal settlement. In fact all throughout the remote forest Kerala, in the post restoration works following the 2018 floods, mechanical measures have been used. It is an irony that the inhabitants of Vanchivayal Tribble Settlements are being singled out and victimized for an action that was absolutely legal, non-damaging to ecology and perfectly in tune with the provisions guaranteed by the Indian constitution and legal instruments such as the Forest Rights Act, 2006.

15. It is respectfully submitted that the explanatory notes to the Notification of Government of Kerala dated 6th April 2011 clearly delineates the Core/ Critical Tiger Habitats and Buffer areas of Periyar Tiger Reserve. From the above Notification as well as from the Section 2(a) of the Forest Rights Act, 2006, it is evident that the said open ground maidanam is an integral part of the Vanchivayal tribal colony and the

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Signed before me:

 M. S. RAJESH
 ADVOCATE, PUNALUR
 Roll. No. K-1349-2000

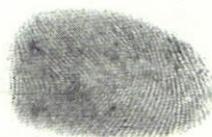
tribal communities have all traditional right to engage in matters connected to the ownership and upkeep of the open ground which is intricately connected to the tribal culture of the Vanchivayal colony ever since the inception of the colony. It is submitted that the subject matter open ground is not a standalone entity located inside virgin forests and that it is a part and parcel of Vanchivayal tribal colony which harmoniously co-exist with the forests and is customarily used by several generations of tribals as a community forest resource.

16. It is respectfully submitted that no activities causing damage to the ecology of the area was undertaken in the said open ground. It is submitted that the works for maintenance of the open ground, being community forest resource, was undertaken without felling of trees or expansion of existing area as decided by grama sabha and EDC. It is submitted that any objection to the same would tantamount to denial of traditional rights to the tribal community and denial of right to live. It will also amount to violation of rights including but not limited to those conferred under Forest Rights Act, 2006.

17. It is respectfully submitted that, being the residents of the Vanchivayal tribal settlement who are law abiding and have been living in perfect harmony with the forests and in proactive engagement with Periyar Tiger Reserve, the Gram Sabha (Oorukootam) on 25.04.2017 had decided to undertake the maintenance of the open ground/ playground presently used by the children of the Vanchivayal colony. It is further submitted that the Vanchivayal tribal colony is entitled to undertake maintenance of the open ground in terms of the provisions of the Forest Act, 2006.

18. It is respectfully submitted that from the Social Resources Land Use Map of the Village Micro plan prepared jointly by the Forest Department and Vanchivayal Eco development Committee, submissions of the villagers and Google Maps, it is evident that the open ground/ maidanam of Vanchivayal has been in existence for long and customarily used by the community as a common gathering place for festivals.

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Signed before me;

M. S. RAJESH
ADVOCATE, PUNALUR
W.P. No. K-1349-2007

rituals, functions and playground for children. Copies of the Village Micro plan, Google images and submissions of the villagers are produced.

19. It is respectfully submitted that welfare of tribal communities is a stated objective of the Government, Forest Department and civil society. Eco development Committees have been constituted in the tribal settlements of Kerala with this object. Vanchivayal Tribal Settlement is one of the best tribal settlements of Kerala in terms of social welfare, involvement of tribal communities in forest protection and community empowerment.

20. It is crystal clear from the above that the Applicant is purposefully misleading the Hon'ble Court by giving facts and details of some other location totally disconnected from what is mentioned in this application. It is also seen that the Applicant is also purposefully hiding even fundamental facts that the open space in question is part and parcel of a tribal settlement. There is no reason to believe that this is unintentional and on the other hand it is evident that the aim of the Applicant is to mislead this Hon'ble Tribunal. This surrogate representation of facts is a clear testimony to the nefarious designs of the Applicant for violating the fundamental rights of the tribals guaranteed by the Indian Constitution and the laws in force.

21. It is respectfully submitted that the repair and maintenance of the open space (*oorumaidanam*) was always done by the community either as a community activity (if it's of small scale) or as an outsourced work (if the quantum of work is more). In this case, a JCB was already hired for the purpose of digging and cleaning a pond inside tribal settlement. So the same was used for removing the debris accumulated in the ground and road, without cutting even a single tree or increasing the extent of the already existing open space. The photos submitted by the Applicant to establish heavy earth movement are misleading ones. Those photos are taken in such a way that even a small pile of mud appears to be a mountain of soil. The Applicant alleges that trees were cut, but hasn't submitted any evidence showing that the area was wooded and not an open ground. Rather the Applicant keeps on alleging the use of JCB, which is a

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Signell before me
M. S. RAJESH
ADVOCATE, PUNALUR
K-1349-20

normal practice not only in Vanchivayal, but also in all other tribal settlements in Kerala. The use of JCB for repairing a community ground and blocked road is not a new activity especially in the post flood scenario in Kerala. The Applicant in the disguise of a conservationist is questioning the basic rights of the Tribals to live a decent life guaranteed by Indian State. He has never been to Vanchivayal colony or taken any pains to understand the reality before filing such a false case for increasing the drudgery of the tribal communities.

22. It is further submitted that no new construction of any sort is made in the area. During the unprecedented floods that wreaked havoc in the whole of Kerala during 2018 and 2019 this ground and the road was covered by accumulated soil and rocks eroded by water and gullies were formed leaving the open ground and road badly damaged. It is submitted that the Grama Sabha and EDC discussed this matter and decided to remove the debris from the already existing open ground and road which is a community forest resource as guaranteed by the Forest Rights Act, 2006 and part and parcel of the tribal colony without felling of trees or expansion of the area. The Tribal community has undertaken this restoration process as per the provisions of the Forest Rights Act, 2006. The Applicant is either thoroughly ignorant of the provisions of the Forest Rights Act, 2006 or has filed this Application to inflict agonies to the tribal communities by his nefarious arguments. It was a community activity carried out in the area for restoring an open ground and road which is part and parcel of tribal culture in the aftermath of an unprecedented natural disaster.

23. It is humbly submitted that the following provisions lay down the applicability of the Forest Rights Act, 2006 in the instant case:

Section 2 (a) - *"community forest resource" means customary common forest land within the traditional or customary boundaries of the village or seasonal use of landscape in the case of pastoral communities, including reserved forests, protected forests and protected areas such as Sanctuaries and National Parks to which the community had traditional access;*

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Signed before me:

M. S. RAJESH,
ADVOCATE, PUNALUR
Roll. No. K-1349-2000

Section 3(1) defines the forest rights of forest dwelling Scheduled Tribes and other traditional forest dwellers on all forest lands, which secure individual or community tenure or both. This includes vide Sub Section 3(1)(l) - *any other traditional right customarily enjoyed by the forest dwelling Scheduled Tribes or other traditional forest dwellers, as the case may be, which are not mentioned in clauses (a) to (k) but-excluding the traditional right of hunting or trapping or extracting a part of the body of any species of wild animal;*

Section 3(2) of the Forest Rights Act provides for the developmental rights of the tribal communities. It says *Notwithstanding anything contained in the Forest (Conservation) Act, 1980, the Central Government shall provide for diversion of forest land for the following facilities managed by the Government which involve felling of trees not exceeding seventy-five trees per hectare, namely:- (a) schools; (c) anganwadis; (k) skill up-gradation or vocational training centers; and (m) community centers: Provided that such diversion of forest land shall be allowed only if, (i) the forest land to be diverted for the purposes mentioned in this subsection is less than one hectare in each case; and (ii) the clearance of such developmental projects shall be subject to the condition that the same is recommended by the Gram Sabha.*

Section 13 of the Rules made under the Tribal Act, 2006 published as EXTRAORDINARY, PART II, SECTION 3, SUB-SECTION (i) OF DATED 1st JANUARY, 2008 with Amendments on 6th September 2012 recognizes the following for determination of forest rights.-

(1) *The evidence for recognition and vesting of forest rights shall, inter alia, include (a) public documents, Government records such as Gazetteers, Census, survey and settlement reports, maps, satellite imagery, working plans, management plans, micro-plans, forest enquiry reports, other forest records, record of rights by whatever name called, pattas or leases, reports of committees and commissions constituted by the Government, Government*

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Signed Before me:

M. S. RAJESH
ADVOCATE, PUNALUR
P. S. No. K. 1349-2006

orders, notifications, circulars, resolutions; physical attributes such as house, huts and permanent improvements made to land including; (g) traditional structures establishing antiquity such as wells, burial grounds, sacred places; (i) Statement of elders other than claimants, reduced in writing.

Section 8 also says that *No court shall take cognizance of any offence under section 7 unless any forest dwelling Scheduled Tribe in case of a dispute relating to a resolution of a Gram Sabha or the Gram Sabha through a resolution against any higher authority gives a notice of not less than sixty days to the State Level Monitoring Committee and the State Level Monitoring Committee has not proceeded against such authority.*

As per Section 10(1) -*No suit, prosecution or other legal proceeding shall lie against any officer or other employee of the Central Government or the State Government for anything which is in good faith done or intended to be done by or under this Act. (2) No suit or other legal proceeding shall lie against the Central Government or the State Government or any of its officers or other employees for any damage caused or likely to be caused by anything which is in good faith done or intended to be done under this Act. (3) No suit or other legal proceeding shall lie against any authority as referred to in Chapter IV including its Chairperson, members, member-secretary, officers and other employees for anything which is in good faith done or intended to be done under this Act.*

24. It is submitted that all throughout the tribal settlements of Kerala, the *adivasis* celebrate festivals, rituals and other socio-cultural activities. It is part and parcel of their culture and social process. Forest Department has been promoting such activities through EDCs and VSSs. The conduct of local football matches by the local communities in the settlement has to be seen from that proactive perspective. Also, as per the provisions of Section 27(1)(b)(c)(e) under Wildlife Protection Act, 1972

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Signed before me
 M. S. RAJESH
 ADVOCATE, PUNALAI
 Roll. No. K-1349-2000

people residing within the limits of Sanctuary and their dependants can enter the Sanctuary.

25. It is submitted that if the tribal youth in tribal settlements are not engaged through such proactive measures, then there is every chance that nefarious and anti-social elements may drag them away. Welfare of tribal communities is a stated objective of the government and Forest Department. Eco development Committees have been constituted in the tribal settlements of Kerala with this objective. Vanchivayal Tribal Settlement is one of the best tribal settlements of Kerala in terms of social welfare, involvement of tribal communities in forest protection and community empowerment. It has taken several years of proactive engagement between forest department and the tribal communities of Vanchivayal to reach to this stage of social development. This engagement has also maintained a harmonious and peaceful situation in the tribal settlement including the absence of any extremist or anti-social tendencies (which is reported from many other tribal settlements in the state). Heeding to a legitimate demand of the local tribal community is not a charity to be bestowed by the any government department but a moral, social and legal obligation.

26. It is submitted that the Applicant deliberately suppresses many facts and it is surprising to note that there is no mention of Vanchivayal Tribal Colony in the whole application. The Applicant is willfully trying to conjure up an imagery that the open ground/ playground mentioned in the application is a standalone entity located inside a virgin forest and deliberately hides the fact that it is a part and parcel of Vanchivayal tribal colony who have had a harmonious co-existence with the forests and are customarily being used by several generations of tribals as a community forest resource. It is submitted that the said suppression of facts, apparently intended with ulterior motives of the Applicant is a serious violation of basic human rights and traditional rights of the tribal communities who are having an isolated and peaceful life co-existing with nature. The Applicant along with other anti social and anti tribal elements is trying to tarnish the image of the Vanchivayal tribal community, winners

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Signed before me:

M. S. BALAN
ADVOCATE, KUNPLUR
Roll. No. K. 134/2000

of the award for the *best tribal colony* in Kerala in front of the society. The Applicant has widely circulated the photographs of the oorumaidanam in social and visual media leading to the many issues from Police and Vigilance Department of Forest Department. The hidden objective of the Applicant is to gain popularity and financial benefits from the anti social elements at the cost of the self-esteem and fundamental rights of traditional Oorali community. The malicious suppression of facts and nefarious efforts of the Applicant to mislead the court by presenting distorted and suppressed arguments seriously undermines the provisions of Right to Equality guaranteed by the Constitution and also the legal provisions of the Tribal Rights Act, 2006.

27. It is respectfully submitted that the instant Application is not maintainable in law or facts and especially in terms of the provision of the Forest Act, 2006.

28. I humbly submit that after knowing of all the above, the applicant has approached this Hon'ble Tribunal for his vested interest and there is no public or environment interest is involved in the present issue, hence the present application is liable to be dismissed with huge cost.

29. I humbly submit that the applicant with an ill intention to interfere with the basic rights of this Respondents provided under the law has filed the present application and the same is an abuse of process of law. Further, he is not entitled to any relief as claimed in the present application.

PRAYER

It is therefore prayed that this Hon'ble Tribunal be pleased to dismiss the above Original Application as devoid of any merits with exemplary cost and pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the circumstances of the case and thus render justice.



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COUNSEL FOR 8TH RESPONDENT



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8TH RESPONDENT

Signed Before me;

M. S. RAJESH
ADVOCATE, THIRUVARUR
Roll. No. K-1349 2006

VERIFICATION

I, T.Ajayan, son of Mr. Thankappan, aged about 47 years, residing at Vanchivayal Oorali Tribal Colony, do hereby verify that the contents of paras 1 to 29 were read out and translated to me and are true to the best of my knowledge and paras 1 to 29 are believed to be true on legal advice and that I have not suppressed any material fact.

Verified at Vanchivayal on this the 22nd day of October, 2021



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8th RESPONDENT *uu*

Signed before me;

M. S. RAJESH
ADVOCATE, PUNALUR
Roll. No. K-1349-2008

[Handwritten signature]