

171
BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE BENCH, BHOPAL

I.A NO. - **06** --- OF 2024

IN

ORIGINAL APPLICATION NO. 221 /2024

Kamlesh Roj Applicant
Versus
The State of Rajasthan Respondents

INDEX

| S.No. | Particulars | Page. No. |
|-------|---|-----------|
| 1. | Application for the Stay of Operation of the Respondent Industries No.- 8, 9, 10 till Final Disposal of the Matter along with supporting Affidavit | 1-3 |
| 2. | <u>Annexure-A/1:</u> Recent Photographs showing encroachments by Respondents 8, 9, 10 effecting catchment area, natural vegetation and serious threat to human being, birds, animals etc. | 4-6 |
| 3. | Vakalatnama | 7 |
| 4. | Proof of Service | 8 |

DATE: ... 8 / 11 / 2025

PLACE: BHOPAL

FILED THROUGH



SEEMA ROJ (R/2558/2018), RINKU ROJ(R/6329/2023)

COUNSELS FOR THE APPLICANT

Plot No. - 361, Tagore Nagar,

Ajmer Road, Jaipur, Rajasthan -302021

Mobile- 7742081801, 9116113778

Email Id- ngtrojlegalassociates@gmail.com , seemaroj2@gmail.com

172
BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE BENCH, BHOPAL

I.A NO.-----**06**-----OF 2024

IN

Original Application No. 221 /2024

Kamlesh RojApplicant
Versus
The State of RajasthanRespondents

APPLICATION FOR THE STAY OF OPERATION OF THE RESPONDENT
INDUSTRIES NO. 8, 9, 10 TILL FINAL DISPOSAL OF THE MATTER

To,
THE HON'BLE CHAIRMAN AND HIS COMPANION
MEMBER OF THE NATIONAL GREEN TRIBUNAL

MAY IT PLEASE YOUR LORDSHIPS,

The humble Applicant, above named, most respectfully submits as under:-

1. That the present Application is filed seeking permission of this Hon'ble Tribunal to Stay in Operation of the Respondent Industries of No.- 8, 9, 10 till Final Disposal of the matter in O.A NO. 221/2024 reason being they are causing serious threat to human beings, birds, animals and environment at large.

As already stated in the original application the respondents no- 8, 9 are continuously (which means till date) hindering the catchment area and causing damage to the environment along with capturing Gair Mumkin Pal/land of the *Chaparwada Canal* in their possession. These respondents even taken down tress which results in violation of the legislation and causing destruction of the dense natural vegetation which leads to grave ecological imbalance.

Apart from this even Respondent No. 10 is also contributing to this act and still engaging in stone cutting operations and depositing its solid and liquid waste into natural canal which is resulting serious health issues in surrounding villages as this canal primary aim is to provide irrigation and drinking safe water but sole purpose is infringed here due to negligence of the respondents and developed Private dumping yard and occupied Gair Mumkin Pal which is a serious threat to environment, birds and animals as well human





beings. The recent photographs captured by the applicant which shows recent encroachments, violation of legislations and serious threat to human, animals, birds etc. are marked and Annexure as Annexure- A/1.



2. That in the Stay Application the Applicant has every hope to get success. The facts and grounds taken in the Original Application would reveal a strong prima facie case in favour of humble Applicant. To avoid repetition the Original Application may be treated a part and parcel of this stay application.
3. That in the facts and circumstances of the case if interim relief as prayed for is not granted, the Environment, Whole human Clan, birds, animals etc. shall suffer huge irreparable loss which cannot be compensated in terms of money or otherwise.
4. That the application is made bonafide and in the interest of justice.

PRAYER

It is, therefore, prayed that this stay application may kindly be accepted and during the pendency of Original Application and the respondent No. 8, 9, 10 be directed to provisionally stay Operation of the Industries till final disposal of the matter in the interest environment. Any other order or direction as may be deemed fit and proper in the facts and circumstances of the case may also be passed in favour of humble applicant.


Humble Applicant

FILED THROUGH



SEEMA ROJ (R/2558/2018), RINKU ROJ(R/6329/2023)

COUNSELS FOR THE APPLICANT

**Plot No. – 361, Tagore Nagar,
Ajmer Road, Jaipur, Rajasthan -302021**

Mobile- 7742081801, 9116113778

Email Id- ngtrojlegalassociates@gmail.com , seemaroj2@gmail.com

Notes:-

1. No such stay application has been filed by the Applicant previously in this matter.
2. PF, notices and extra sets shall be filed as per directions of the Hon'ble Tribunal.

Date:8/11/25

Place: Bhopal



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE BENCH, BHOPAL

I.A NO. **06** OF 2024

IN

Original Application No. 221 /2024

Kamlesh RojApplicant
Versus
The State of RajasthanRespondents

AFFIDAVIT IN SUPPORT OF STAY APPLICATION

I, Kamlesh Roj S/o Prahlad Sahay Roj, R/o Roj Dhani, Village- Baget, Gram Panchayat- Khudiyala, Tehsil- Mojmabad, District- Dudu- 303008 Rajasthan, do hereby take oath and state as under:-

1. That I am Applicant in the instant Stay Application and well conversant with the facts of the application and am thus fully competent to swear this affidavit.
2. That I am filing this instant Stay Application before this Hon'ble Tribunal.
3. That I have read the accompanying Stay Application, the contents of which are true and correct to the best of my knowledge and belief and has been drafted on my instruction by my counsel.

*Identified by
S. R. Sharma
28/12/24
CR/2558/18*

Kamlesh
DEPONENT

VERIFICATION

I, the above named deponent, do hereby verify on oath that the contents of Para No. 1 to 3 of the above affidavit are true and correct to the best of my personal knowledge. Nothing material has been concealed and no part of it is false. So help me God.



Kamlesh
DEPONENT

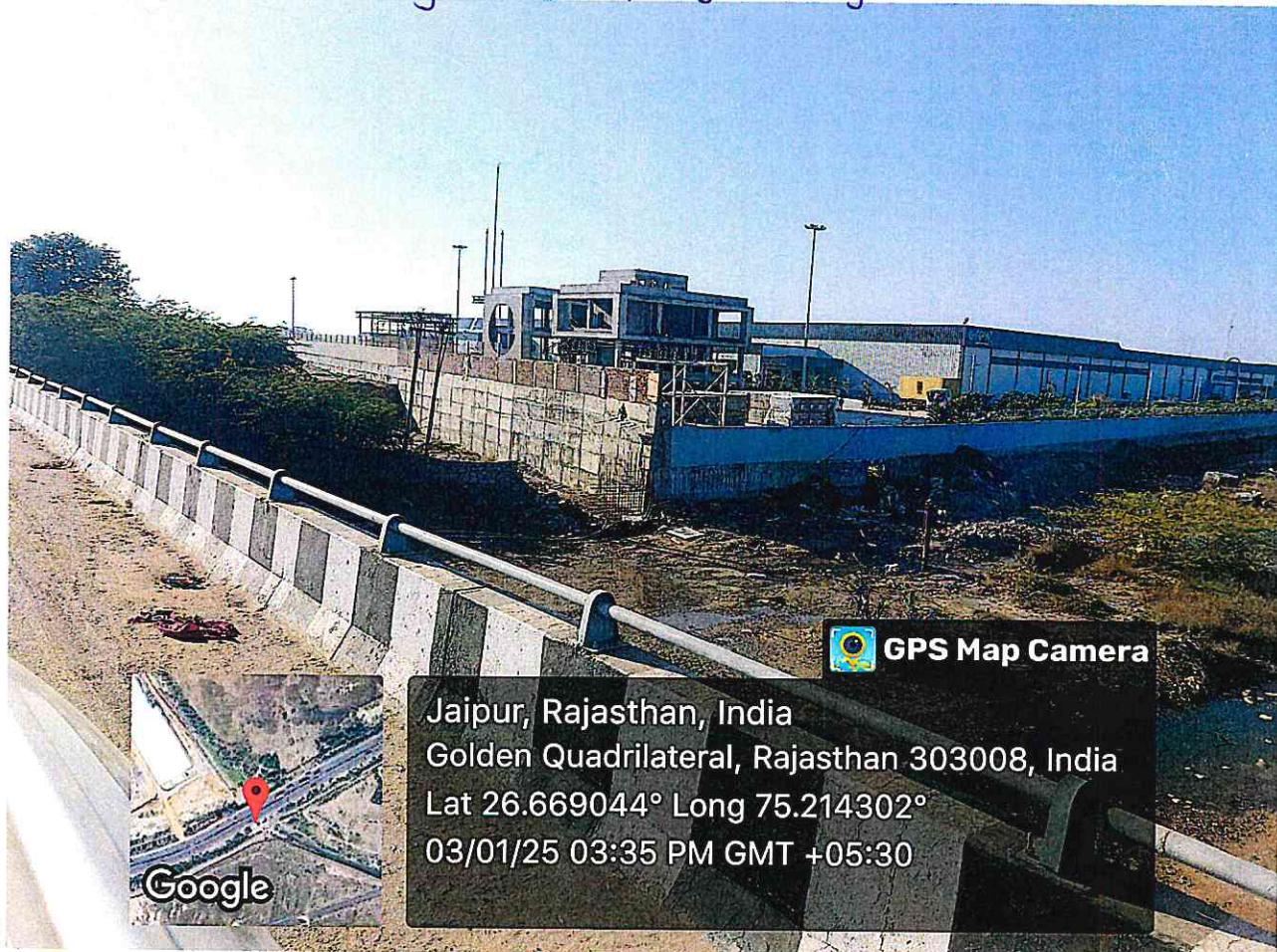
217 DEC 2024

ATTESTED
[Signature]
NOTARY PUBLIC
JAIPUR (RAJ) INDIA

217 DEC 2024



R-7 dumping waste openly leading serious threat to environment

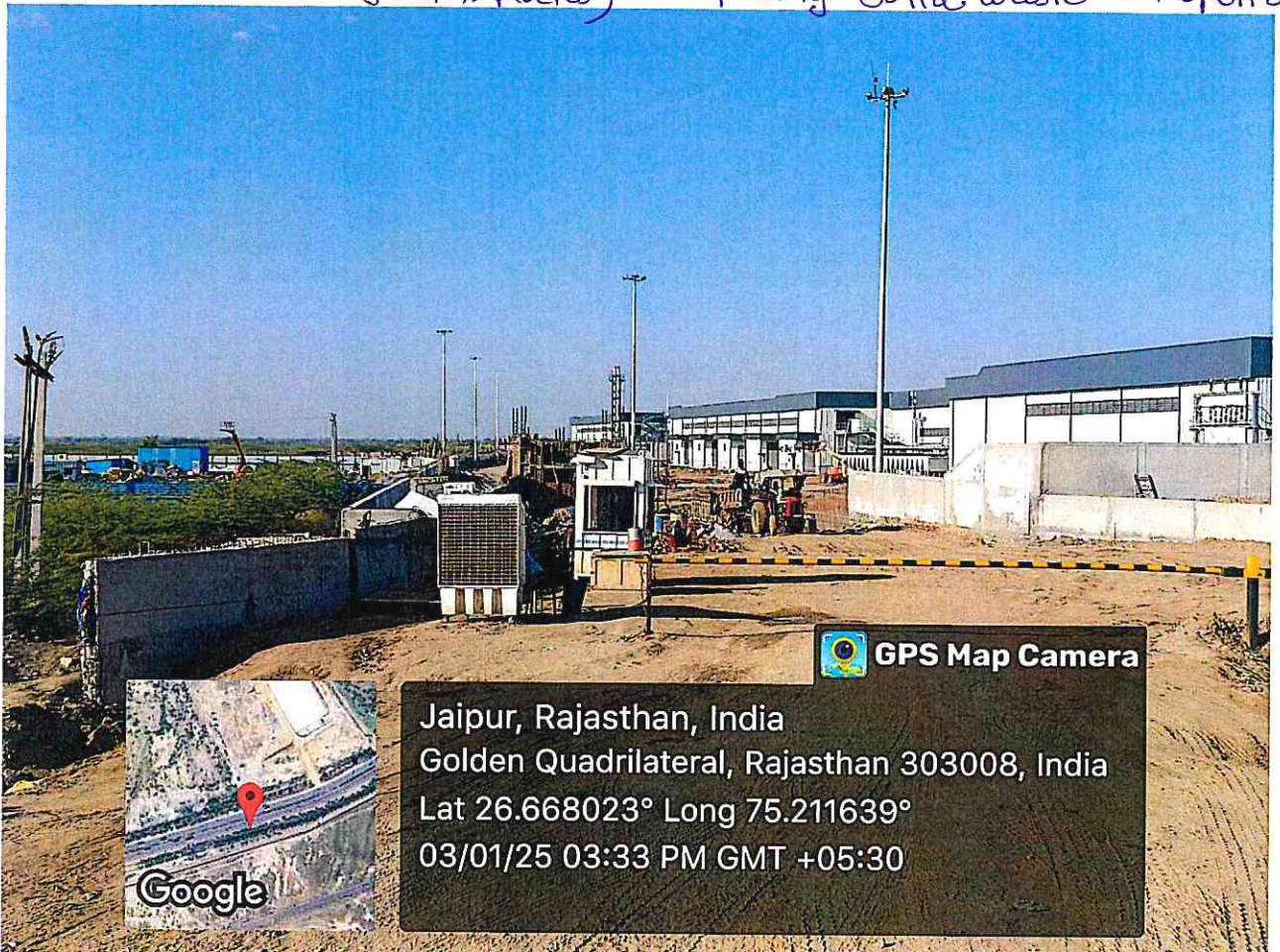


R-7 & 8 Negligence causes destruction to natural vegetation resulting ecological imbalance



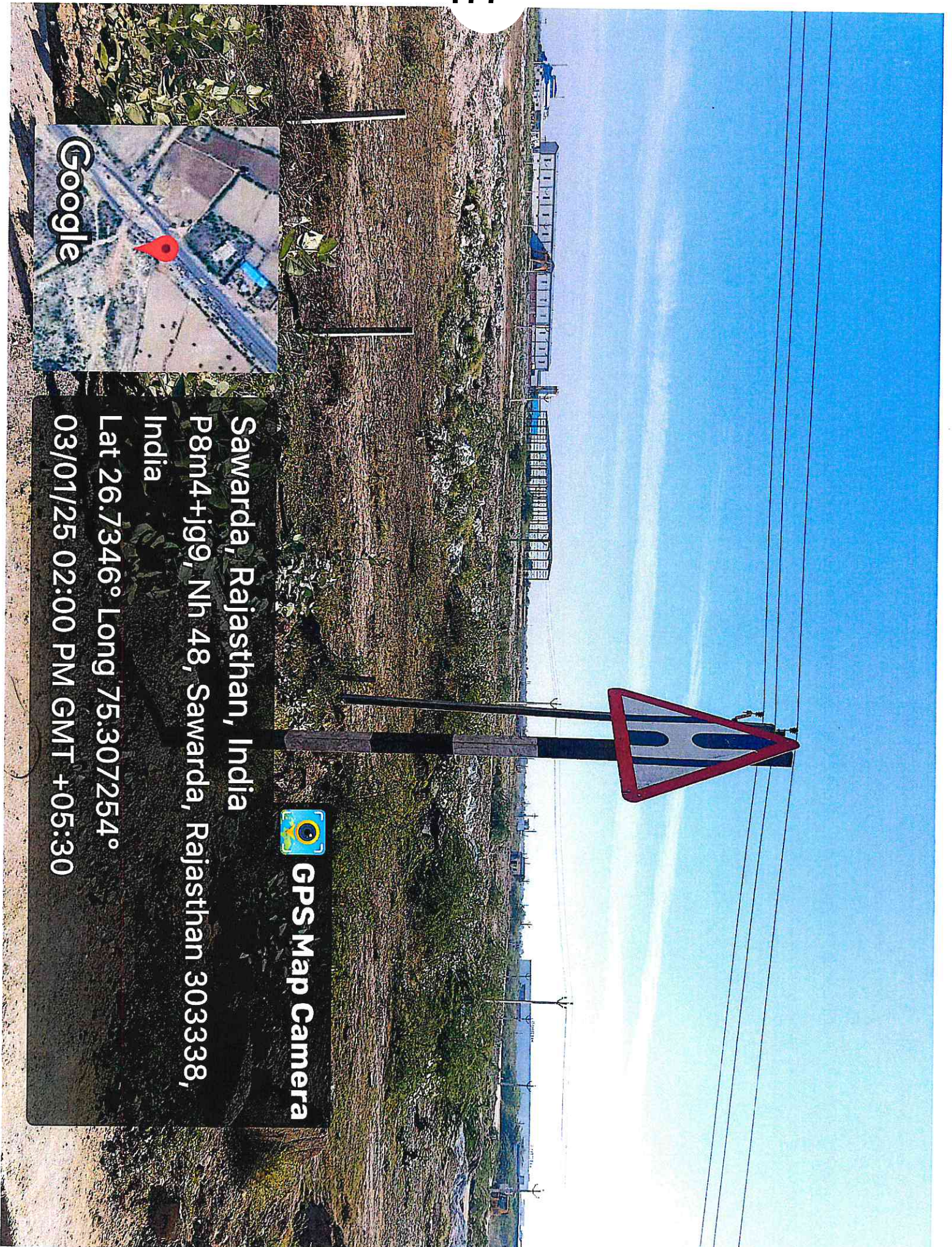
GPS Map Camera
 Sawarda, Rajasthan, India
 P8m4+jg9, Nh 48, Sawarda, Rajasthan 303338,
 India
 Lat 26.73437° Long 75.306978°
 03/01/25 02:00 PM GMT +05:30

Res-10 (Magnatix Rocks) deposing solid waste in open surrounding



GPS Map Camera
 Jaipur, Rajasthan, India
 Golden Quadrilateral, Rajasthan 303008, India
 Lat 26.668023° Long 75.211639°
 03/01/25 03:33 PM GMT +05:30

*R-7 & 8 (Chirpal & crew) hindering ^{Chaitumkya Pal} catchment area/area of
 of Chhapawada Canal & Continuous Construction till date*



R- 10 dumping waste openly near its premises

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE BENCH, BHOPAL

I.A NO. ~~---~~⁰⁶---OF 2024

IN

ORIGINAL APPLICATION NO. 221_/2024

Kamlesh RojApplicant

Versus

The State of RajasthanRespondents

VAKALATNAMA

I, Kamlesh Roj ,S/O Prahlad Sahay Roj Applicant herein, do appoint and retain Ms. Seema Roj (Enrollment No. R/2558/2018), Ms. Rinku Roj (Enrollment No. R/6329/2023) Advocates to appear me in the above Application and to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any application connected with the same or any decree or order passed therein including all applications for return of documents or the receipt to any moneys that may be payable to me in the said Appeal/ Application and also in appeal under to the Supreme Court of India and in all applications for review Judgment.

I Certify that the contents of this vakalatnama at were read our and explained in my presence to the Executant who appeared perfectly to understand the same and made his / her their signature in my presence

Executed before me this (Date) 8/1/2025



ACCEPTED:
(Applicant)



(Counsel for Applicant)



Email: ngtrojlegalassociates@gmail.com ,
seemaroj2@gmail.com

Mobile: 9116113778

Address: Plot No- 361, Tagore Nagar,
Ajmer Road, Jaipur, Rajasthan (302021)

179



in:sent



Compose

Inbox

Starred

Snoozed

Sent

Drafts

More

Labels

service of I.A in O.A-221/2024 TO R- 8,9 & 10 in "Kamlesh Roj v State of Rajast



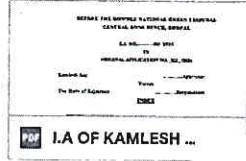
ngtrojlegalassociates <ngtrojlegalassociates@gmail.com>

8:17PM (O r

to corporate, info, magnetixrocks

PFA OF I.A IN O.A NO- 221/2024 NGT

One attachment • Scanned by Gmail



Reply Reply all Forward



Enable desktop notifications for Gmail. OK No thanks