

**EFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONAL BENCH AT CHENNAI**

APPEAL NO. 82 OF 2021

IN THE MATTER OF:

MAHESH MAMINDLA AND ANOTEHR APPELLANTS

VERSUS

STATE OF TELANGANA AND OTHERS RESPONDENTS

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THROUGH



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Date: 22. 08.2022

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONAL BENCH AT CHENNAI**

APPEAL NO. 82 OF 2021

IN THE MATTER OF:

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VERSUS

STATE OF TELANGANA AND OTHERS RESPONDENTS

**REJOINER ON BEHALF OF THE APPELLANTS TO THE REPLY
AFFIDAVIT FILED BY RESPONDENT NO. 3, FOREST DEPARTMENT,
GOVERNMENT OF TELANGANA, RESPONDENT NO. 4 & 5, IRO,
HYDERABAD & MINISTRY OF ENVIRONMENT, FOREST & CLIMATE
CHANGE AND RESPONDENT NO. 6, HYDERABAD GROWTH
CORRIDOR LIMITED:**

MOST RESPECTFULLY SHOWETH:

1. The above-mentioned Appeal was filed by the Appellants under Sections 16(e) read with Section 20 of the National Green Tribunal Act, 2010 challenging the legality and correctness of the Stage-I Forest Clearance *vide* letter No.4-TSC180/2021-HYD/091 dated 13.05.2021, Stage-II Forest Clearance *vide* letter No. 4-TSC180/2021-HYD/155 dated 7.12.2021 which is granted by Ministry of Environment, Forest, and Climate Change Integrated Regional Office, Hyderabad (MoEF&CC) and the Working Permission bearing No. 13470/2019/FC-4 dated 7.08.2021 granted by Principal Chief Conservator of Forests, Government of Telangana. That all the permissions have been granted to Transmission Corporation of Telangana Limited (TRANSCO) for erection and installation of 400KV Overhead DC transmission lines from Kethireddipally 400 KV SS to 400 KV Rayadurg GIS along the Outer Ring Road CORR), Shamshabad Division, Telangana, and passing through

forest area admeasuring 6.7075 ha. That the issues raised for quashing the Forest Clearance granted are:

- a) That Form A Part I filled by Respondent No. 2 i.e., TRANSCO has provided the map of the land required for diversion only and has deliberately concealed the entire details of the cadastral map along with measurements of the Mrugavani National Park, Chilkur Reserve Forest and the eco-sensitive zone hence no boundary verification survey has been done;
- b) That Form A Part II which is filled by the Deputy Conservator of Forest for obtaining Forest Clearance provides wrongful, misleading and incorrect information by stating that the forest land proposed for diversion for the erection of transmission line is not located within eco-sensitive zone of Mrugavani National Park;
- c) That the total admeasured area of the Mrugavani National Park in Gazette Notification is 360 ha whereas the area as per the Principal Chief Conservator of Forest, Telangana measures as 287 ha. This discrepancy in the measurement of the total area of the National Park clearly shows that primary function of identifying the boundaries has not been conducted and it has not been verified whether the project is a part of the said National Park;
- d) That while granting Stage-I and Stage-II clearance the IRO of MoEF&CC did not apply its mind with respect to impact of overhead transmission line on the wild life of the area;
- e) That Form A Part II which is filled by the Deputy Conservator of Forest for obtaining Forest Clearance also provides wrongful, misleading and incorrect information by stating that the forest land proposed for diversion for the erection of transmission line is not within 1 km from any National Park;

- f) That both Form A Part I and Part II which are filled by the Respondent No. 2 and the Deputy Conservator of Forest for obtaining Forest Clearance wrongful and misleading information by stating that no non-forest land is being required for the project;
- g) That the MoEF&CC has granted clearance for the diversion of the forest land without application of its mind and has grossly erred in assessing the impact of the overhead transmission lines that it will cause by irreversible fragmentation which eventually severs the umbilical cord between Mrugavani National Park and Chilkur Reserve Forest thereby blocking the pathway of faunal movement through the forest area and posing potential hazards of faunal movement through the forest area;
- h) That the Cost-Benefit analysis by the Respondent No. 2 only included the cost of trees at a minimal rate and has failed to include the impact of fragmentation, aesthetic values, collisions and electrocutions of birds and other grave impact on the ecology;
- i) That the Ministry of Environment Forest and Climate Change did not examine the alternatives to the overhead transmission lines which is more important in the present fact when there is National Park and a reserved forest on either side;
- j) That the proposed overhead transmission line is coming up within prohibited zone of 15 meters in violation of Outer Ring Road Buffer Zone Guidelines;
- k) The IRO of MoEF&CC has also ignored the observation and direction of the Hon'ble Supreme Court in M.K. Ranjitsinh & Ors. vs. Union of India & Ors. Writ Petition (Civil) No. 838 of 2019, wherein the Hon'ble Supreme Court has directed for shifting of overhead transmission line to underground.

2. That the instant Joint Rejoinder is being filed in response to the affidavit filed by Respondent No. 3, Forest Department, Govt. of Telangana, Respondent Nos. 4 and 5, Integrated Regional Office, Hyderabad and Ministry of Environment, Forest and Climate Change respectively and Respondent No. 6, Hyderabad Growth Corridor Limited. At the outset, the Appellants deny various statements which have been made and nothing should be assumed to be admitted unless specifically admitted or is part of the record. The Appellants reiterate all the facts and submissions made in the Appeal to be true and correct and the same may be read as part of the instant rejoinder and are not all being repeated for the sake of brevity.

**REJOINDER TO THE REPLY AFFIDAVIT OF RESPONDENT NO. 3,
FOREST DEPARTMENT, GOVERNMENT OF TELANGANA:**

3. That the contents of the counter affidavit of the Respondent No. 2 are denied unless specifically admitted or are of matter of record. Following are the main contentions raised by the Respondent No. 2 in the counter affidavit:
 - i. That in Para No. 4, R-3 raised the contention that the impuned project is not falling within the Mrugavani National Park, but falling within the proposed/deemed eco-sensitive zone of the Mrugavani National Park.
 - ii. That in Para 5 of the of Affidavit R3 states that TRANSCO has entrusted the work of preparing the Wildlife Mitigation Plan to the Principal Scientist & Head, All India Network Project on Vertebrate Pest Management, PJTS Agricultural University, Rajendranagar, Hyderabad.
 - iii. That in Para No. 6, R-3 submits that the proposed area is falling within the 1 km of the Chilkur Mrugavani National Park (located at a distance ranging from 50m to 300m) from the boundary of

Chilkur National Park and falling within the deemed Eco-Sensitive Zone.

- iv. That in Para 12 of the counter Affidavit R3 states that Mrugavani National Park is for an extent of 360ha, however, as measured using the modern technologies of DGPS and GIS, the extent of area is estimated as 287 ha and the variation is due to the adoption of different techniques for surveying, mapping and area estimating techniques.
 - v. That in Para 13 of the counter Affidavit R3 states that the cost benefit analysis is not required for this project (area is less than 20 ha) and hence the cost-benefit analysis furnished by TS TRANSCO is not evaluated and same may be ignored.
4. That all the contentions by Respondent No. 2 are responded in following paras:
- i. That in Para No. 4, R-3 raised the contention that the impugned project is not falling within the Mrugavani National Park, but falling within the proposed/deemed eco-sensitive zone of the Mrugavani National Park. The Appellants herein deny the contention in its entirety and states that the total admeasured area of the Mrugavani National Park in Gazette Notification is 360 ha whereas the area as per the Principal Chief Conservator of Forest, Telangana measures as 287 ha. This discrepancy in the measurement of the total area of the National Park clearly shows that primary function of identifying the boundaries has not been conducted and it has not been verified whether the project is a part of the said National Park. Furthermore, it is pertinent to note that in the reply affidavit of Respondent No. 4 & 5, Integrated Regional Office, Hyderabad and Ministry of Environment, Forest and Climate Change they have accepted that there is a discrepancy with regard to whether the impugned project

falls within the eco-sensitive zone of the Mrugavani National Park or falls within the Mrugavani National Park itself and stated that such discrepancy needs clarification. And yet no survey was done by any respondent to ascertain and demarcate the boundary of National Park, before diversion of forest land. That Para No. 9 & 10 of the Affidavit of R-4 & R-5 states that *"based on the Decision Support System (DSS) analysis the area violates the Protected the Protected Area Rule and falls in Mrugavani National Park. The above discrepancy needs clarification and if the area falls under ESZ, then appropriate permission is needed"*. It is thus submitted by the Appellants that without marking 360 ha of the national park, it cannot be asserted that the impugned project is in eco-sensitive zone and not itself in the Mrugavani National Park.

- ii. That in Para 5 of the of Affidavit R3 states that TRANSCO has entrusted the work of preparing the Wildlife Mitigation Plan to the Principal Scientist & Head, All India Network Project on Vertebrate Pest Management, PJTS Agricultural University, Rajendranagar, Hyderabad. The Appellants here submit that the Wildlife Mitigation Plan is submitted only after the present Appeal is filed before this Hon'ble Tribunal merely in the form of an Affidavit. That R3 has not provided copy of full set of documents accompanying Annexure 5. Annexure 5 of reply by R3 states *"The Wildlife mitigation plan submitted by the UA and the scheme prepared by District Forest Officer, Rangareddy has been examined in detail and the same is accepted. (copies enclosed)"*. But such claimed copies enclosed are not provided and only cover letter is shared. It is also pertinent to note that the study has failed to take on record the ORR approval stipulation of not permitting forest

fragmentation and use of under-passes for faunal movement. Thus, the study has miserably failed to appreciate that the cumulative impact of the already situated Outer Ring Road as well as the erection of the Transmission Lines will cause irreversible fragmentation which eventually destroys the umbilical cord from Mrugavani National Park to Chilkur Reserve Forest thereby blocking the pathway and posing potential hazards of faunal movement through the forest area. Further, it may be noted from Annexure 6 submitted by R-3 that under Wildlife Mitigation Plan, a preposterous amount of Rs. 40 lakhs to be spent on '*Procurement of a Safari vehicle for visitors along with maintenance for a period of 5 years*'. Likewise, Rs. 20 lakhs is to be spent on log huts in 'visitor zone' in the name of wildlife mitigation plan. The Appellants submit that the Forest Department has used funds allotted for wildlife mitigation for its own welfare with least regard for wildlife. That another important factor which the Plan has missed out on is the presence of number of trees which are available which is a very basic study parameter. Furthermore, the WL mitigation plan by the Principal Scientist & Head, All India Network Project on Vertebrate Pest Management, PJTS Agricultural University, Rajendranagar, Hyderabad as provided shows that Invasive species like Hyptz's suaveolens, Lantana camera, Setaria pumila, Prosopis juliflora, etc. are dominant and require removal to prevent them from invading existing wild habitat and surrounding environs. Human plantations have come up on forest land in National Park and its ESZ in recent years, further establishing neglect and destruction of forest. Both in size and quality of forest, the national park is gravely endangered, and instead

of restoration, more diversion of forest land is done through impugned project.

- iii. That in Para No. 6, R-3 submits that the proposed area is falling within the 1 km of the Chilkur Mrugavani National Park (located at a distance ranging from 50m to 300m) from the boundary of Chilkur National Park and falling within the deemed Eco-Sensitive Zone. That Appellants herein submit that in contrary to the above contention, the Deputy Conservator of Forest in Form A Part II Sr. No. 8(iv) stated that, '*8(iv) Whether any national park, wildlife sanctuary, biosphere reserve, tiger reserve, elephant corridor, wildlife migration corridor etc. is located within 1 km from the boundary of the forest land proposed for diversion: **NO***'. This contradiction in the statements clearly establishes that the IRO, MoEF&CC was deliberately misled by this grossly false submission. That in Para 8 of the reply, R-3 merely stated that '*proposals are verified on ground while processing*'. The Appellants further submit R-3 has not rebutted the false assertion made in Form A Part II to the IRO, MoEF&CC to obtain clearance by providing misleading information.
- iv. That in Para 12 of the counter Affidavit R3 states that Mrugavani National Park is for an extent of 360ha, however, as measured using the modern technologies of DGPS and GIS, the extent of area is estimated as 287 ha and the variation is due to the adoption of different techniques for surveying, mapping and area estimating techniques. The Appellants deny the contention raised and states that R-3 justification with regard to the discrepancy in the size of the National Park is unambiguous. That instead of using the technology to enforce Gazette and identify discrepancies, R-3 has conveniently shifted the blame upon technology as a

reason to justify the discrepancy. The Appellants further submit that despite such discrepancies, not a single survey has been done in the past 24 years since publication of Gazette. Also, when the ORR came up in the same forest area 2006-2007, even then no survey or measurement was done while diverting the forest land. Thus, it is pertinent to note that only the map of the land diverted by TS TRANSCO was provided to MoEF&CC and not an entire map in context with dimensions and details of Mrugavani National Park. In this regard, Appellants submit that if full 360 ha is marked and surveyed, the impugned project will fall within Mrugavani National Park, hence, without marking 360 ha of the national park, it cannot be asserted that the impugned project is in eco-sensitive zone and not itself in the Mrugavani National Park. That the discrepancy with regard to the 20% loss of area of the National Park was unacknowledged, undiscovered, unreported till this Appeal has been filed and forest diversion is granted without due diligence despite such major concealment persists in all the stages of Forest Clearance.

- v. That in Para 13 of the counter Affidavit R3 states that the cost benefit analysis is not required for this project (area is less than 20 ha) and hence the cost-benefit analysis furnished by TS TRANSCO is not evaluated and same may be ignored. The Appellants submit that this contention of R-3 is in contradiction to Sr. No. G (i) of Form A Part I filed by User Agency which states that '*Whether the Project requires Cost-Benefit Analysis? :Yes*'. That in light of the submission of the User Agency this contention of R-3 is untenable as User Agency has autonomy to do and provide cost-benefit analysis, and annexure VIII cited by R3 itself permits cost-

benefit analysis involving under 20 hectares of land on "case-to-case basis and value judgment". Moreover, as all approval agencies have taken cost benefit analysis into consideration while giving approval. That there is nothing on record to substantiate that R-3 did not include cost-benefit analysis in its assessment of proposal and is merely evading its responsibility now to defend the cost-benefit analysis. However, it is pertinent to note that the cost benefit analysis by Respondent No.2, TS TRANSCO only included the cost of trees at a minimal rate and has failed to include the impact of fragmentation, aesthetic values, collisions and electrocutions of birds, and other grave impacts on the ecology.

REJOINDER TO THE REPLY AFFIDAVIT OF RESPONDENT NO. 4 & 5, INTEGRATED REGIONAL OFFICE, HYDERABAD AND MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE:

- vi. It is pertinent to note that R-4 and R-5 in Para 9 and 10 of its reply affidavit has accepted that there is a discrepancy with regard to whether the impugned project falls within the eco-sensitive zone of the Mrugavani National Park or falls within the Mrugavani National Park itself and stated that such discrepancy needs clarification:

*"a. As per the report of DFO & Conservator of Forests (CF), the "proposed area is not falling in any National Park, Wildlife Sanctuary, Tiger Reserve etc." But as per the Check List in Page No. 10 of the file it reads that the area is "falling in ESZ of the Mrugavani National Park." **It is also submitted that based on the Decision Support System (DSS) analysis the area violates the Protected the Protected Area Rule and falls in Mrugavani National Park. The above discrepancy needs clarification and if the area falls under ESZ, then appropriate permission is needed"**.*

It is *thus* submitted by the Appellants that the TS TRANSCO has deliberately concealed the entire details of the cadastral map along with measurements of the Mrugavani National Park, Chilkur Reserve Forest and the eco-sensitive zone rather has provided the map of the land required for diversion only. Hence, without marking 360 ha of the national park, it cannot be asserted that the impugned project is in eco-sensitive zone and not itself in the Mrugavani National Park.

- i. Furthermore, in this regard it is important to note that no boundary verification survey was done or produced to identify and demarcate the present on-ground size of the boundary and size of the Mrugavani National Park or Chilkur Reserve Forest or eco-sensitive zone of the park. That an RTI application under the Right to Information Act, 2005 was filed on 26.08.2021. As per the RTI response received in the form of a CD on 8.09.2021 from Principal Chief Conservator of Forest, Telangana, the total area of the Mrugavani National Park measures as 287 ha, however, the Gazette Notification measures the national park as 360 ha. This discrepancy in the measurement of the total area of the National Park clearly shows that primary function of identifying the boundaries has not been conducted and also it has not been verified whether the project is a part of the said National Park.
- ii. Para 15 of the reply affidavit states that the Regional Empowered Committee recommended the proposal to issue Stage-I and Stage-II approval on the conditions that State Forest Department shall ensure minimum tree felling and shall carry out plantation of dwarf medicinal plants and also that the proposed area falls in Eco-sensitive Zone, the user agency shall get the mitigation plan prepared. In this regard,

the Appellants submit that the Ministry of Environment, Forest and Climate Change has granted clearance for the diversion of the forest land without application of mind and has grossly erred in assessing the impact of the overhead transmission lines that it will cause by irreversible fragmentation which eventually severs the umbilical cord between Mrugavani National Park and Chilkur Reserve Forest thereby blocking the pathway of faunal movement through the forest area and posing potential hazards. That the impugned project has an observable environmentally adverse effect as it envisions the construction of a physical and electric fence within close vicinity of the Mrugavani National Park and Chilkur Reserve Forest, in the form of 400 kv high tension electricity cables on monopoles. The MoEF&CC has failed to assess and foresee that the impugned project will have the impact of not just reduction of forest land available, but also lead to the fragmentation and severance of the Reserved Forest.

- iii. The IRO of MoEF&CC has also ignored the observation and direction of the Hon'ble Supreme Court in **M.K. Ranjitsinh & Ors. vs. Union of India & Ors.** Writ Petition (Civil) No. 838 of 2019, wherein the Hon'ble Supreme Court has directed for shifting of overhead transmission line to underground. That the Hon'ble Supreme Court vide order dated 19.04.2021 acknowledged the collision risk and electrocution death of birds, including but not limited to endangered species like Great Indian Bustard from high tension transmission lines and thus ordered shifting of overhead cables underground. Being barely few hundred meters from large lakes and Musi River, frequented by birds, the overhead transmission lines are in direct flight path of

birds posing grave accident and death hazard, with potential to destroy the eco-system. In this regard, TS TRANSCO stated that laying of underground cable was not considered in the forest reach as underground cable requires around 1000 sqmt switchyard on both the sides and such arrangement is not possible and is not feasible considering the Forest area. The Appellants here submit that the switchyard can be sited anywhere except forest land, and at any distance away from it in order to conserve the national park. That no supporting documents with regard to the technical requirements of switchyard has not been provided by TS TRANSCO categorically specifying the fact that maintaining switchyard is not feasible considering it a Forest Area.

- iv. The Appellants also submit that the Ministry of Environment, Forest and Climate Change did not consider that there is an option of laying the transmission line underground which will protect the transit of the faunal habitat of the Mrugavani National Park. The permission for diversion of forest land granted will have detrimental impact thereby blocking the pathway and posing potential hazards of faunal movement through the forest area. This habitat destruction can be avoided by simple exercise of laying the transmission line underground. However, the Ministry of Environment, Forest and Climate Change failed to consider this aspect and without proper application of mind allowed for overhead transmission line. It is also submitted that Respondent No. 2 has not undertaken detailed assessment of the available sustainable/less ecologically damaging alternatives to the envisioned location and manner of execution of the impugned project. It is pertinent to note that same has not been

considered and appreciated by the Respondents in their reply.

**REJOINDER TO THE REPLY AFFIDAVIT OF RESPONDENT NO. 6,
HYDERABAD GROWTH CORRIDOR LIMITED:**

- i. That in Para No. 5, R-6 states that vide letter dated 07.09.2018, TS TRANSCO has sought permission from R-6 for laying of 400kV line on Monopoles along the ORR service Road from TSPA Junction to Gachibowli Flyover. That the permission was rejected by R-6 vide letter dated 08.02.2019 on the reason that monopoles cannot be erected in Green Belt as per the ORR Guidelines. Further, TS TRANSCO once again sought permission vide letter dated 18.02.2019 which was once again rejected by R-6 vide letter dated 26.03.2019 on the reason that the Green Belt between ORR and Service Road is earmarked for Metro Rail Corridor. In this regard, the Appellants submit that R-6 has purposely concealed multiple reasons given both times for such rejections and the same has not been recorded in their Affidavit. The Appellants submit that R-6 in Annexure 5 has submitted that:

"i.As per the request once again joint inspection carried out from TSPA junction to Gachibowli flyover with TSTRANSCO officials for reconsideration. Gachibowli to Nanakramguda the ROW is 75m and Nanakramguda to Shamshabad the ROW is 125m and in this corridor the 4m utility corridor also not available on both sides of service roads. Further, the corridor between service road and main carriage way is not green belt corridor, it is metro rail corridor. The green belt corridor is on either side of OR 15m buffer zone beyond ROW of ORR. This land does not belong to HMDA but it is a private property. The metro rail corridor works are also in progress like DPR preparation, and in balance corridor erection of Monopoles not feasible. However, the growth corridor regulations issued by the

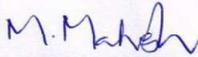
Govt. vide GO.Ms.No.440 Dt:26.10.2013, does not permit erection of any type of poles even in buffer zone of ORR."

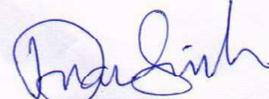
However, R6 has not provided any justification for each of the multiple reasons it itself used to reject the proposal twice. That neither R2 nor R6 produced any waiver of these violations, from any Competent Authority.

- ii. That in **Para** No. 6, R6 contends that route was shifted from one side to the other side. The Appellants in this regard submit that such claim is not specific whether the shift is from Left Hand Side to Right Hand Side or vice versa. It is not borne by physical route on the ground, as also in absence of original and revised route maps and related approval documents, such assertion by R6 cannot be accepted. That R6 has also concealed that Conventional towers are erected in Mrugavani area whereas approval is taken for monopoles. Furthermore, in Para No. 6, R6 states that TS TRANSCO has submitted a revised plan and proposed laying of overhead line from TSPPA junction to Gachibowals alternate route. The Appellants in this regard submit that R6 has deliberately concealed original and revised route map. That Original and revised routes must be submitted by both R2 and R6 to be able to agree/ disagree with their assertions. In particular, on ground locations of monopoles, types of poles (monopole vs conventional quad poles), location of route, location of switchyard vary from claims made by R6, and these can be verified from DPR and other documents to be provided by R2 and R6.

5. Thus, in light of the above facts and circumstances and detailed discussions, the prayers in the Appeal should be allowed.

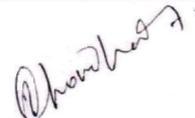
7) Pass any other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the instant case.


APPELLANT NO. 1


APPELLANT NO. 2

THROUGH


RITWICK DUTTA

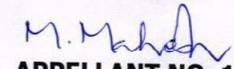

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 Email: litigation.life@gmail.com

Place: Chennai/Delhi

Date: 22.08.2022

VERIFICATION

I, Mahesh Mamindla, S/o Yadagiri Mamindla, R/o H.No: 5-14, Mittapally Village, Siddipet Mandal, Telangana – 502375, do hereby verify that the contents of paragraphs 1 to 5 are true to the best of my knowledge and I have not suppressed any material fact.


APPELLANT NO. 1

I, Dr.Donthi Narashima Reddy, S/o D.Nagireddy, R/o 201, Aarthi Residency, Laxminagar Colony, Saidabad, Hyderabad, Telangana - 500 059, do hereby verify that the contents of paragraphs 1 to 5 are true to the best of my knowledge and I have not suppressed any material fact.


APPELLANT NO. 2

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI
APPEAL NO. 82 OF 2021**

IN THE MATTER OF:

MAHESH MAMINDLA...APPELLANT

VERSUS

STATE OF TELANGANA & ORS....RESPONDENTS

AFFIDAVIT

I, Mahesh Mamindla, S/o. Yadagiri Mamindla, aged 34 years, R/o. H.No: 5-14, Mittapally, Village Siddipet Mandal, Telangana - 502375, do hereby solemnly affirm and state as under: -

1. That I am Appellant No. 1 in the aforementioned Appeal, and I am well conversant with the facts of the case. I am competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.

Kausik Dhar

M. Mahesh
DEPONENT

VERIFICATION

Verified that the contents of this affidavit mentioned in para ___ to ___ are true to the best of my knowledge and belief and nothing has been concealed there from.

Verified on this 22nd day of Aug 2022.

M. Mahesh
DEPONENT

SOUTHERN ZONE BENCH AT CHENNAI

APPEAL NO. 82 OF 2021

IN THE MATTER OF:

MAHESH MAMINDLA

...APPELLANT

VERSUS

STATE OF TELANGANA & ORS RESPONDENTS

AFFIDAVIT

I, Dr.Donthi Narasimha Reddy, S/o. D.Nagireddy, Aged 55 years, R/o. 201, Aarthi Residency, Laxminagar Colony, Saidabad, Hyderabad, Telangana - 500 059, do hereby solemnly affirm and state as under: -

1. That I am Appellant No. 2 in the present matter and I am well conversant with the facts of the case. I am competent to swear this Affidavit.
2. That the contents of the accompanying Rejoinder are true and correct and nothing material has been concealed therefrom.

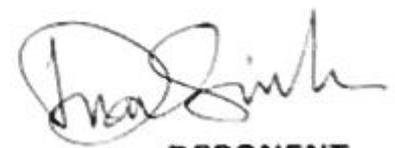
Kaus Jay Phote


DEPONENT

VERIFICATION

Verified that the contents of this affidavit mentioned in para 1 to 5 are true to the best of my knowledge and belief and nothing has been concealed there from.

Verified on this ____ day of ____ 2022.


DEPONENT