

**BEFORE THE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH AT NEW DELHI**  
**ORIGINAL APPLICATION NO. 329 OF 2024**

**IN THE MATTER OF:**

Rajendra Tyagi

...Applicant

Versus

Union of India &amp; Ors.

...Respondents

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Through


**AKASH VASHISHTHA**

(Advocate for the Applicant)

490, Lawyers' Chamber Block-II,

Delhi High Court, New Delhi-110002

Ph.: 9717006866

Email: [akashvashishtha.official@gmail.com](mailto:akashvashishtha.official@gmail.com)

Place:- Delhi

Dated:- 25.03.2025

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**PRINCIPAL BENCH AT NEW DELHI**  
**ORIGINAL APPLICATION NO. 329 OF 2024**

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**ADDITIONAL AFFIDAVIT AND STATUS REPORT ON  
BEHALF OF THE APPLICANT WITH RESPECT TO THE  
STATE OF ILLEGAL AND UNAUTHORIZED  
CONSTRUCTIONS IN GREATER NOIDA AND NOIDA**

The Applicant above-named

**MOST RESPECTFULLY SHOWETH:**

1. That the present Original Application agitates about massive depredation of environment arising from the alarming illegal and unauthorized constructions of houses, shops and other commercial establishments on a gigantic scale in Greater Noida and Noida. The said constructions of illegal and unauthorized colonies and other structures are being carried out without seeking the mandatory Consents to Establish and Operate under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 from the Uttar Pradesh Pollution Control Board. Such constructions of illegal and unauthorized colonies and other structures are further being raised without possessing the Consents to Establish and Operate under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981. None of the said constructions of illegal and unauthorized colonies have valid NOC for ground water extraction from the District Ground Water Management Council, Gautam Budh Nagar nor are their borewells registered with the council, under the

provisions of the Uttar Pradesh Ground Water (Management and Regulation) Act, 2019.

2. That this Hon'ble Tribunal, vide Order, dated: 09.12.2024, in the present Application was pleased to direct as under:

“...

*5. Since, it has been submitted that large scale illegal construction without following environmental norms is in progress, therefore, we direct that till the next date of hearing, concerned authorities of the State and Pollution Control Board will ensure that a project requiring EC/CTE/CTO but not heaving these clearances are not permitted to proceed with the construction illegally till it complies with all the requisite environmental norms and clearances. PCB is also required to prevent illegal plotting in the area falling in floodplain zones in the Villages.*

...”

3. That notwithstanding the aforementioned directions, the illegal and unauthorized constructions [most of which have also been referred to by the Applicant in the Additional Affidavit, Status Report and Response, dated: 24.09.2024, on behalf of the Applicant to the Report, dated: 05.07.2024, filed by the RO, UPPCB (Greater Noida) and Report, dated: 05.07.2024 filed by RO, UPPCB (Noida)] in Greater Noida and Noida are being carried out, unabated, on large scale.
4. That the unidentified and unscrupulous builders/colonizers have rather intensified and accelerated the pace of the illegal and unauthorized constructions so as to evade any demolition exercise (after showing a structure to have achieved completion and hand-over to the purchaser).

(Geo-coordinated, latest photographs of the illegal and unauthorized constructions in Greater Noida and Noida are annexed herewith and marked as **ANNEXURE AA-1**)

5. That despite Order, dated: 09.12.2024, the UPPCB and other public authorities, including the Greater Noida Industrial Development Authority (GNIDA), have not taken any action, whatsoever, against the said illegal and unauthorized constructions and are willfully disobeying the Orders of this Hon'ble Tribunal.
6. That massive third party rights are continuously being created by the said illegal private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia after brisk-selling these illegal properties and luring gullible people into buying such illegal properties and structures. The illegal private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia are employing all means and measures and continuously telling the people that 70-80% percent of their properties have already been sold off and several families have started living in such properties and the remaining ones will be sold in another month's time. They are further telling the people that whatever open lands are visible at their sites will be completely occupied in another six months' time and no open land will be visible after that time. As a means of luring people, the illegal private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia are further telling the people that they have highly negotiable rates to offer for such properties and that such properties are authorized and the cheapest in Greater Noida, Noida and Ghaziabad.
7. That the illegal private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia are laying down RCC concrete roads

and erecting electricity poles, among other measures, to lure people at large to buy the illegal and unauthorized properties and structures. The Respondent No. 11, Noida Power Company Ltd. (NPCL) is aiding and abetting the illegal and unauthorized constructions by providing electric transmission network and electricity connections.

8. That the illegal private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia are luring people by inter alia naming their properties by sophisticated names such as Highway, Mansions, Villas, Homes, Greens, etc., presenting attractive lay-outs of the sites, thereof, displaying furnished sample-flats and rooms, attractive photos and videos, thereof, providing security features, swimming pools and club houses and highway/Metro accessibility and connectivity etc.
9. That the aforesaid illegal colonies/townships/villas/shops/flats/apartments/malls are being financed by banks and financial institutions such as Canara Bank, Punjab National Bank, Indian Overseas Bank, ICICI, HDFC and LIC.
10. That the Respondent Nos. 3 and 6, State of Uttar Pradesh, and District Magistrate, Gautam Budh Nagar, respectively, are actively aiding the illegal and unauthorized constructions by registering the sale of the said properties at Dadri Tehsil, in District Gautam Budh Nagar.
11. That according to a news report titled, 'Nami builder se pareshaan log avaidh colonizers ke jaal me fans rahe' (People troubled by big named builders falling under the trap of illegal colonizers), dated: 17.11.2024, published in the daily Hindi newspaper, Dainik Jagran, illegal colonizers have sold more than 1 lakh flats in the rural areas of Greater Noida and as many as 70000 flats in over 2000 projects of illegal colonizers are

under construction. The news report further states that more than 1 lac illegal flats have been illegal constructed and sold in Greater Noida.

(A True Copy of the news report titled, 'Nami builder se pareshaan log avaidh colonizers ke jaal me fans rahe' (People troubled by big named builders falling under the trap of illegal colonizers), dated: 17.11.2024, published in the daily Hindi newspaper, Dainik Jagran, is annexed herewith and marked as **ANNEXURE AA-2**)

12. That while dealing with the issue of illegal and unauthorized constructions, the Hon'ble Supreme Court, in C.A. No. 14604 of 2024, *Rajendra Kumar Barjatya and Anr. Vs. U.P. Avas Evam Vikas Parishad & Ors.* [2024 INSC 990], had, inter alia held that illegal and unauthorized construction cannot be perpetuated and such constructions have to be necessarily demolished.

The relevant parts of the Judgment are extracted as under:

“ ...

17. ...

That apart, the registration of the property would not in any way amount to regularizing the unauthorized construction. The power to take action against an unauthorized construction is independent and not in anyway connected to the Registration Act. Seen from any angle the appellants cannot claim that the construction of shops was in accordance with law.

...

19. In a catena of decisions, this Court has categorically held that illegally of unauthorized construction cannot be perpetuated. If the construction is made in contravention of the Acts / Rules, it would be construed as illegal and unauthorized construction, which has to be necessarily demolished. It cannot be legitimized or protected solely under the ruse of the passage of time or citing inaction of the authorities or by taking recourse to the excuse that substantial money has been spent on the said construction.

...

20. In the ultimate analysis, we are of the opinion that construction(s) put up in violation of or deviation from the building plan approved by the local authority and the constructions which are audaciously put up without any building planning approval, cannot be encouraged.

Each and every construction must be made scrupulously following and strictly adhering to the Rules. In the event of any violation being brought to the notice of the Courts, it has to be curtailed with iron hands and any lenience afforded to them would amount to showing misplaced sympathy. Delay in directing rectification of illegalities, administrative failure, regulatory inefficiency, cost of construction and investment, negligence and laxity on the part of the authorities concerned in performing their obligation(s) under the Act, cannot be used as a shield to defend action taken against the illegal/unauthorized constructions. That apart, the State Governments often seek to enrich themselves through the process of regularisation by condoning/ratifying the violations and illegalities. The State is unmindful that this gain is insignificant compared to the long-term damage it causes to the orderly urban development and irreversible adverse impact on the environment. Hence, regularization schemes must be brought out only in exceptional circumstances and as a onetime measure for residential houses after a detailed survey and considering the nature of land, fertility, usage, impact on the environment, availability and distribution of resources, proximity to water bodies/rivers and larger public interest. Unauthorised constructions, apart from posing a threat to the life of the occupants and the citizens living nearby, also have an effect on resources like electricity, ground water and access to roads, which are primarily designed to be made available in orderly development and authorized activities. Master plan or the zonal development cannot be just individual centric but also must be devised keeping in mind the larger interest of the public and the environment. Unless the administration is streamlined and the persons entrusted with the implementation of the act are held accountable for their failure in performing statutory obligations, violations of this nature would go unchecked and become more rampant. If the officials are let scot-free, they will be emboldened and would continue to turn a nelson's eye to all the illegalities resulting in derailment of all planned projects and pollution, disorderly traffic, security risks, etc.

21. Therefore, in the larger public interest, we are inclined to issue the following directions, in addition to the directives issued by this Court in *Re: Directions in the matter of demolition of structures (supra)*:

(i) While issuing the building planning permission, an undertaking be obtained from the builder/applicant, as the case may be, to the effect that possession of the building will be entrusted and/or handed over to the owners/beneficiaries only after obtaining completion/occupation certificate from the authorities concerned.

(ii) The builder/developer/owner shall cause to be displayed at the construction site, a copy of the approved plan during the entire period of construction and the authorities concerned shall inspect the premises periodically and maintain a record of such inspection in their official records.

(iii) *Upon conducting personal inspection and being satisfied that the building is*

*constructed in accordance with the building planning permission given and there is no deviation in such construction in any manner, the completion/occupation certificate in respect of residential / commercial building, be issued by the authority concerned to the parties concerned, without causing undue delay. If any deviation is noticed, action must be taken in accordance with the Act and the process of issuance of completion/occupation certificate should be deferred, unless and until the deviations pointed out are completely rectified.*

(iv) *All the necessary service connections, such as, Electricity, water supply, sewerage connection, etc., shall be given by the service provider / Board to the buildings only after the production of the completion/occupation certificate.*

(v) *Even after issuance of completion certificate, deviation / violation if any contrary to the planning permission brought to the notice of the authority immediate steps be taken by the said authority concerned, in accordance with law, against the builder / owner / occupant; and the official, who is responsible for issuance of wrongful completion /occupation certificate shall be proceeded departmentally forthwith.*

(vi) *No permission /licence to conduct any business/trade must be given by any authorities including local bodies of States/Union Territories in any unauthorized building irrespective of it being residential or commercial building.*

(vii) *The development must be in conformity with the zonal plan and usage. Any modification to such zonal plan and usage must be taken by strictly following the rules in place and in consideration of the larger public interest and the impact on the environment.*

(viii) *Whenever any request is made by the respective authority under the planning department/local body for co-operation from another department to take action against any unauthorized construction, the latter shall render immediate assistance and co-operation and any delay or dereliction would be viewed seriously. The States/UT must also take disciplinary action against the erring officials once it is brought to their knowledge.*

(ix) *In the event of any application / appeal / revision being filed by the owner or builder against the non-issuance of completion certificate or for regularisation of unauthorised construction or rectification of deviation etc., the same shall be disposed of by the authority concerned, including the pending appeals / revisions, as expeditiously as possible, in any event not later than 90 days as statutorily provided.*

(x) *If the authorities strictly adhere to the earlier directions issued by this court and those being passed today, they would have deterrent effect and the quantum of litigation before the Tribunal / Courts*

*relating to house / building constructions would come down drastically. Hence, necessary instructions should be issued by all the State/UT Governments in the form of Circular to all concerned with a warning that all directions must be scrupulously followed and failure to do so will be viewed seriously, with departmental action being initiated against the erring officials as per law.*

*(xi) Banks / financial institutions shall sanction loan against any building as a security only after verifying the completion/occupation certificate issued to a building on production of the same by the parties concerned.*

*(xii) The violation of any of the directions would lead to initiation of contempt proceedings in addition to the prosecution under the respective laws.*

...”

(Emphasis supplied)

13. That the said illegal and unauthorized constructions defeats the very of objective of the Master Plan for bringing about a planned a planned development and is causing permanent environmental hazards to the areas I which they are raised.

### **PRAYER**

In light of the above facts and circumstances, it is, most respectfully, prayed that this Hon’ble Tribunal be, graciously, pleased to:

- (i) Constitute a high-powered Joint Committee to look into all the facts and issues raised in the Original Application as well as in the instant Additional Affidavit;
- (ii) Constitute an empowered Task Force to restrain and crack down on the private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia carrying out illegal and unauthorized constructions in Greater Noida and Noida; Launch criminal prosecutions against the violators; Establish a permanent monitoring mechanism;
- (iii) Grant the reliefs sought in the Original Application;
- (iv) Direct the Respondents concerned to identify all private contractors/illegal colonizers/developers/private builders/property dealers/real estate agents/land mafia carrying out illegal and unauthorized constructions in

Greater Noida and Noida; put the list containing such details on the respective websites and publish the same in national and local newspapers on regular basis;

- (v) Direct the Respondents concerned to blacklist all the persons and companies after identifying as above;
- (vi) Direct the Respondents concerned to not create any third-party rights in the illegal and unauthorized constructions;
- (vii) Direct the UPPCB not to grant any Consent to Establish and/or Operate to any such constructions/operation/activity/process, which is already underway, under the Water and Air Acts;
- (viii) Pass any other or such further Order(s) or direction(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the present case.



**APPLICANT**

Through



**AKASH VASHISHTHA**

(Advocate for the Applicant)

490, Lawyers' Chamber Block-II,

Delhi High Court, New Delhi-110002

Ph.: 9717006866

Email: [akashvashishtha.official@gmail.com](mailto:akashvashishtha.official@gmail.com)

Place:- Delhi

Dated:- 25.03.2025

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**BEFORE THE NATIONAL GREEN TRIBUNAL  
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**IN THE MATTER OF:-**

RAJENDRA TYAGI

... APPLICANT

VERSUS

UNION OF INDIA &amp; ORS.

... RESPONDENTS

**AFFIDAVIT**

I, Rajendra Tyagi, S/o Lt. Sh. Dharamveer Singh Tyagi, aged about 67 years, R/o 7/17, Chiranjiv Vihar, Ghaziabad –Uttar Pradesh-201002, Presently at New Delhi do hereby solemnly affirm and state as under:

1. That I am the Applicant in the above titled Original Application and am conversant with the facts and circumstances described in the present case and as such, I am competent to swear this affidavit.
2. That the contents of the Additional Affidavit are true and correct and nothing material has been concealed therefrom.



I, IDENTIFIED THE  
DEPONENT WHO HAS  
SIGNED IN MY PRESENCE


**DEPONENT****VERIFICATION**

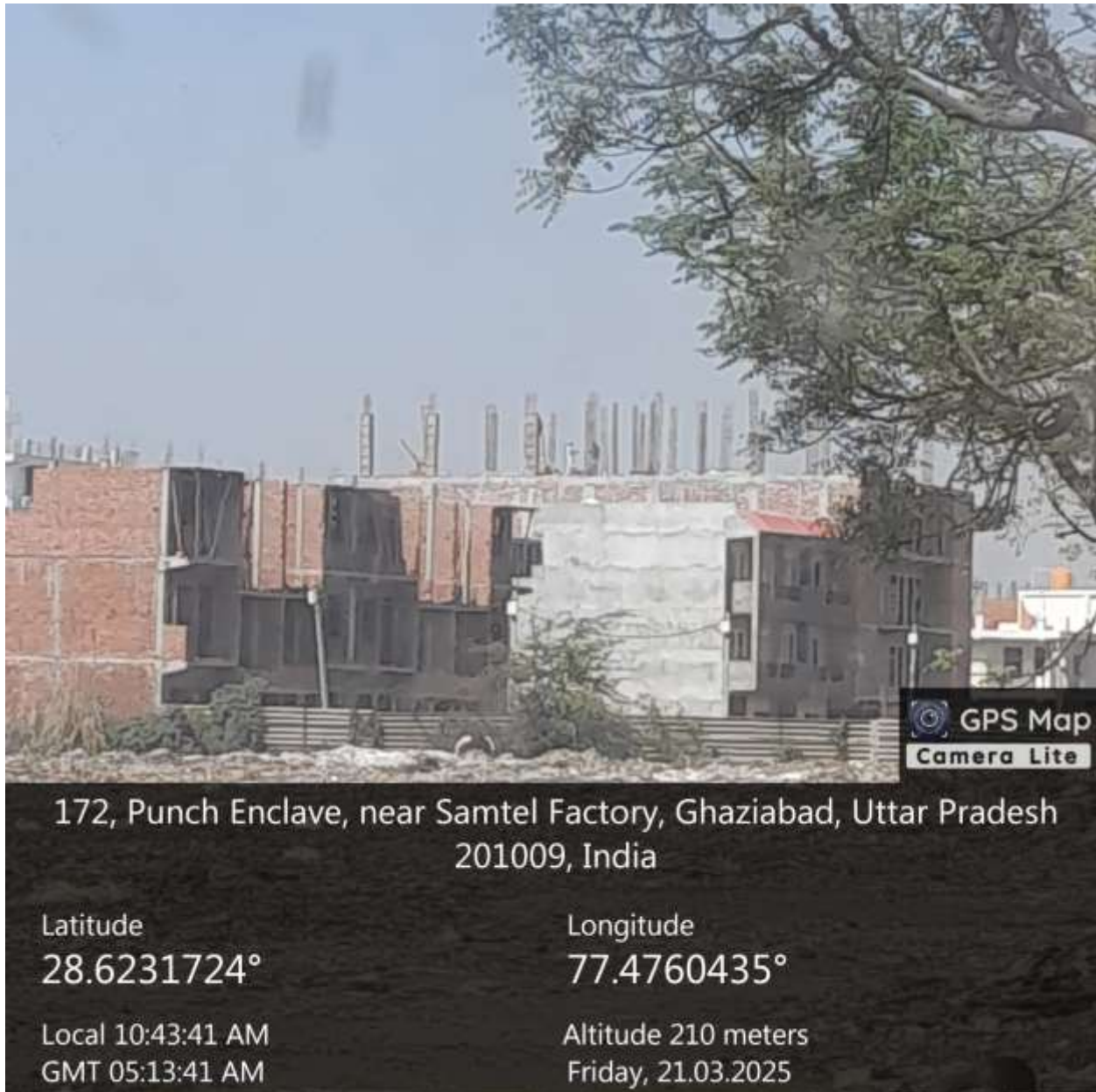
Verified on this 25<sup>th</sup> day March 2025, that the contents of the above mentioned affidavit are true and correct and nothing material has been concealed therefrom.



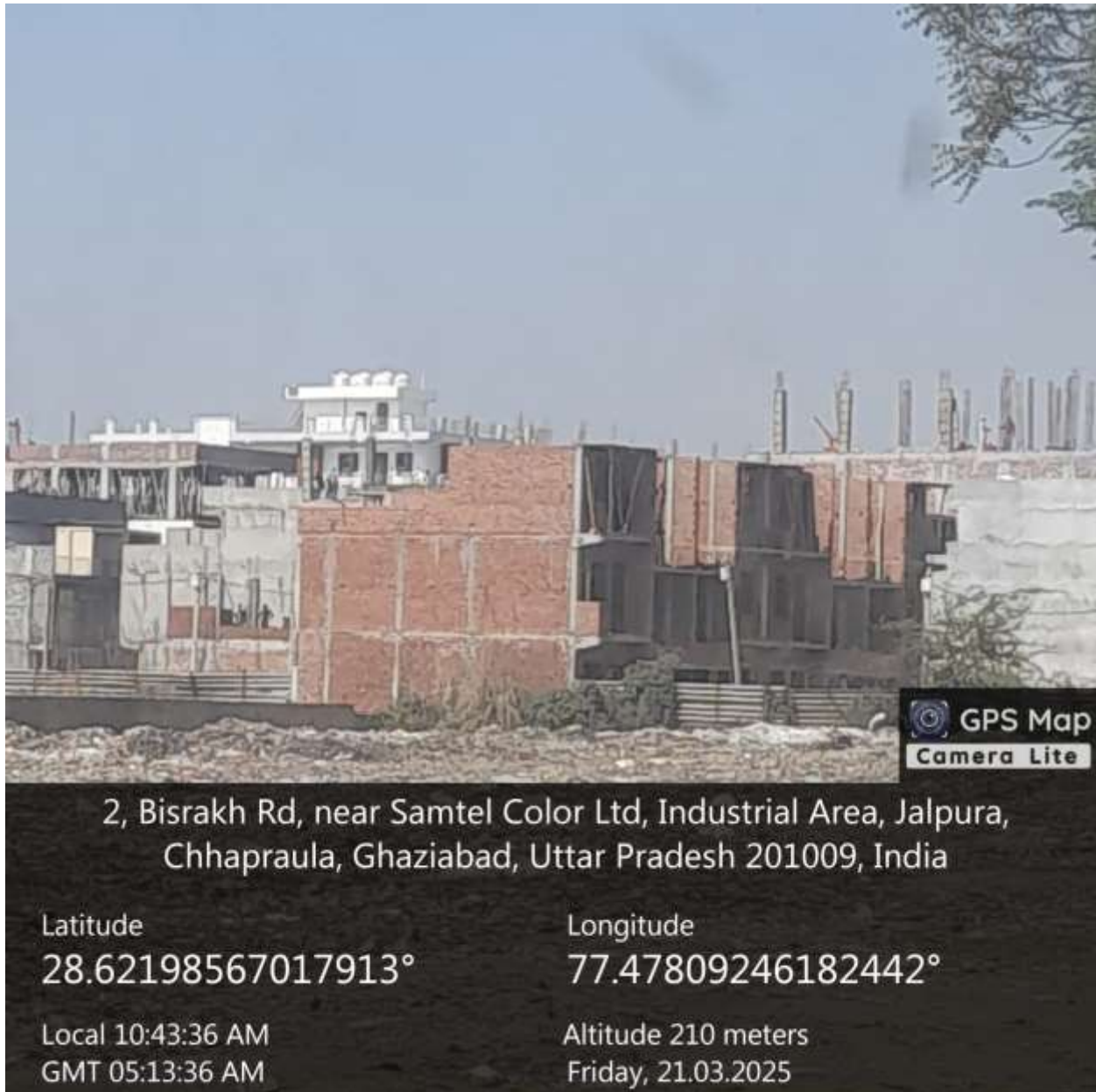
**ATTESTED**  
  
**NOTARY PUBLIC**


**DEPONENT**

## ANNEXURE AA-1



**Illegal and unauthorized constructions being perpetrated by Respondent No. 12, Ghaziabad Developers & Builders, and Respondent No. 13, Bhagwati Developers, on the land of erstwhile Samtel Colour Ltd. at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 12, Ghaziabad Developers & Builders, and Respondent No. 13, Bhagwati Developers, on the land of erstwhile Samtel Colour Ltd. at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 12, Ghaziabad Developers & Builders, and Respondent No. 13, Bhagwati Developers, on the land of erstwhile Samtel Colour Ltd. at G.T. Road, in Greater Noida.**



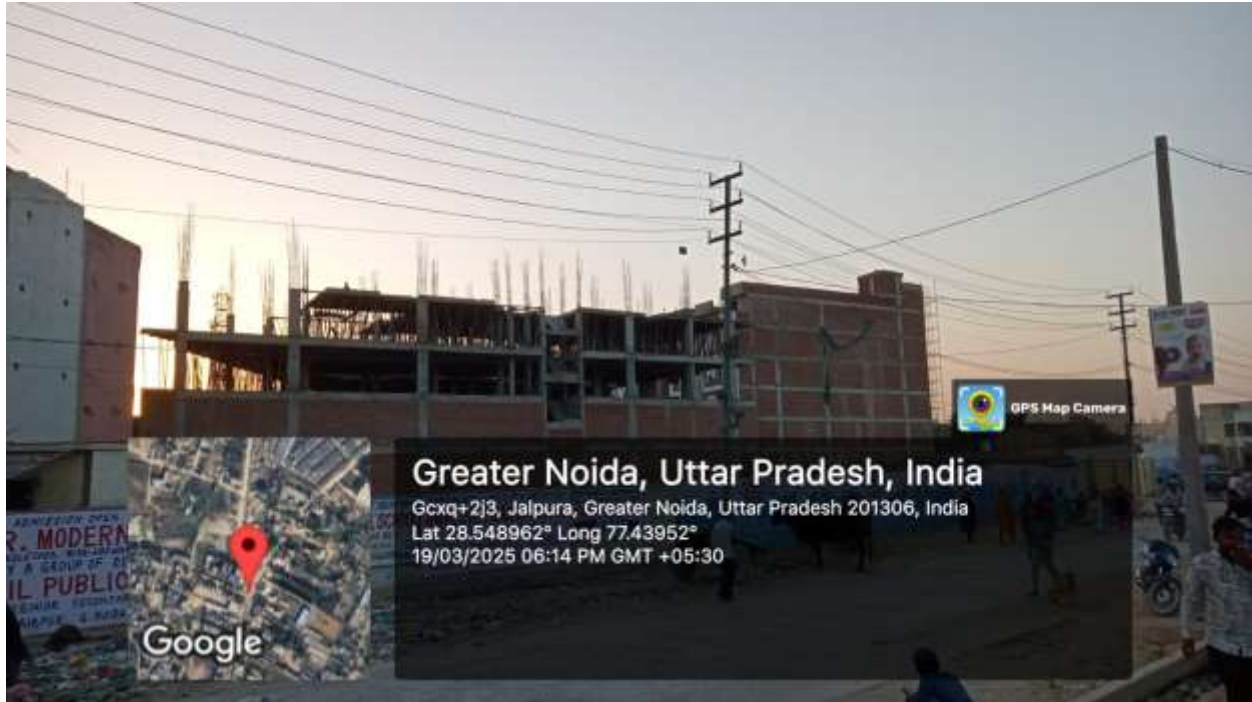
**Illegal and unauthorized constructions being perpetrated by Respondent No. 12, Ghaziabad Developers & Builders, and Respondent No. 13, Bhagwati Developers, on the land of erstwhile Samtel Colour Ltd. at G.T. Road, in Greater Noida.**



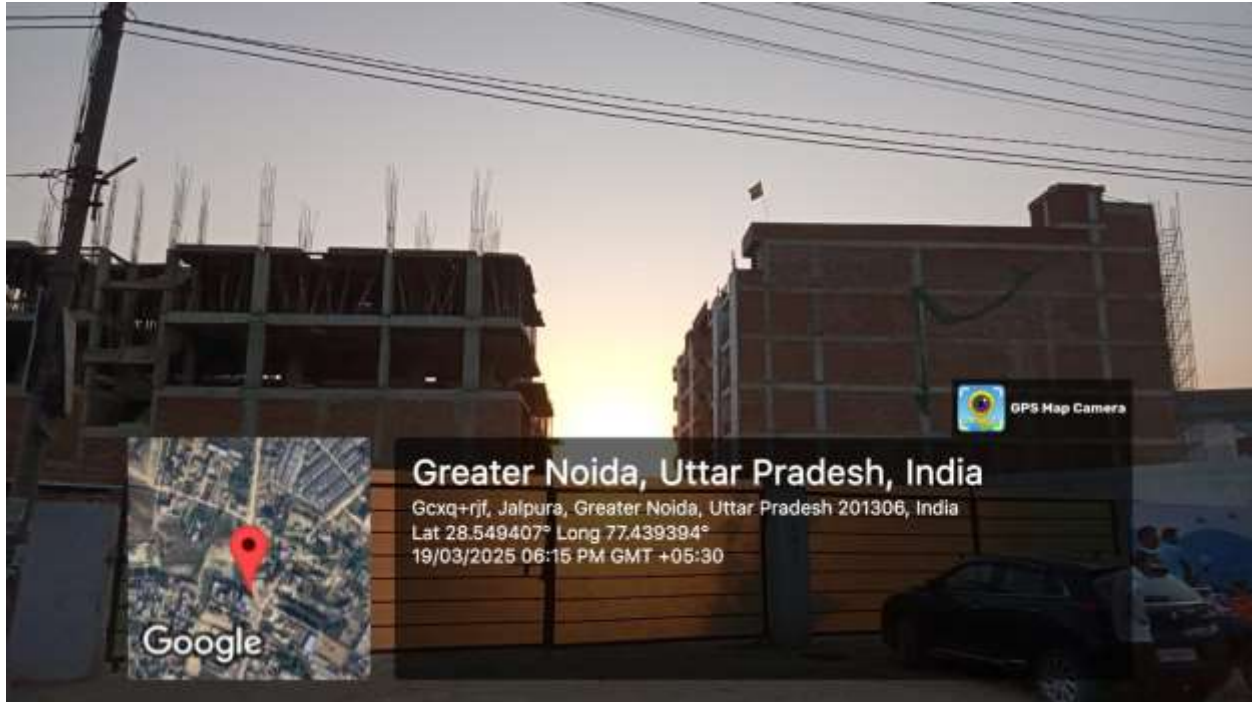
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**Illegal and unauthorized constructions being perpetrated by Respondent No. 12, Ghaziabad Developers & Builders, and Respondent No. 13, Bhagwati Developers, on the land of erstwhile Samtel Colour Ltd. at G.T. Road, in Greater Noida.**



**Trinity High Street project being constructed illegally by "Trinity Ventures" in full swing. It is a huge illegal under-construction residential complex coming up on agricultural land at Jalpura village, Greater Noida West without any NOC from GNIDA and without any Environmental Clearance, CTE and CTO from UPPCB. More than 300 flats in 6 towers are being built along with a shopping complex. The registration is taking place at Dadri Tehsil Office. Groundwater is being extracted without permission and electricity connections are being obtained.**



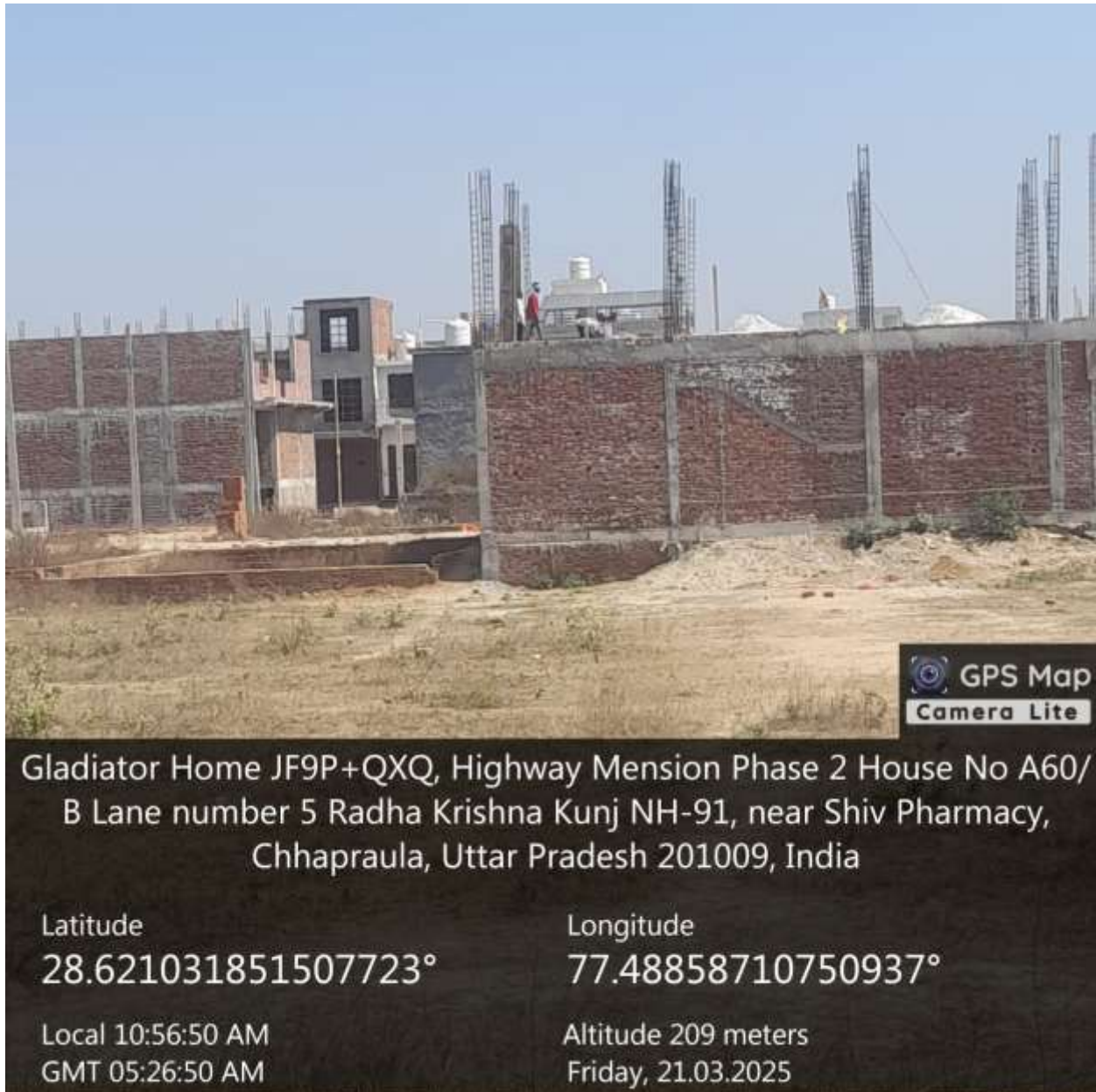
**Trinity High Street project being constructed illegally by "Trinity Ventures" in full swing. It is a huge illegal under-construction residential complex coming up on agricultural land at Jalpura village, Greater Noida West without any NOC from GNIDA and without any Environmental Clearance, CTE and CTO from UPPCB. More than 300 flats in 6 towers are being built along with a shopping complex. The registration is taking place at Dadri Tehsil Office. Groundwater is being extracted without permission and electricity connections are being obtained.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 12, Ghaziabad Developers & Builders, and Respondent No. 13, Bhagwati Developers, on the land of erstwhile Samtel Colour Ltd. at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 14, Sahara Enclave, at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 14, Sahara Enclave, at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being carried out at Talabpur, in Greater Noida.**



**Illegal and unauthorized constructions being carried out at Talabpur, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 14, Sahara Enclave, at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 14, Sahara Enclave, at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 14, Sahara Enclave, at G.T. Road, in Greater Noida.**



**Illegal and unauthorized constructions being perpetrated by Respondent No. 14, Sahara Enclave, near Chapraula, at G.T. Road, in Greater Noida.**



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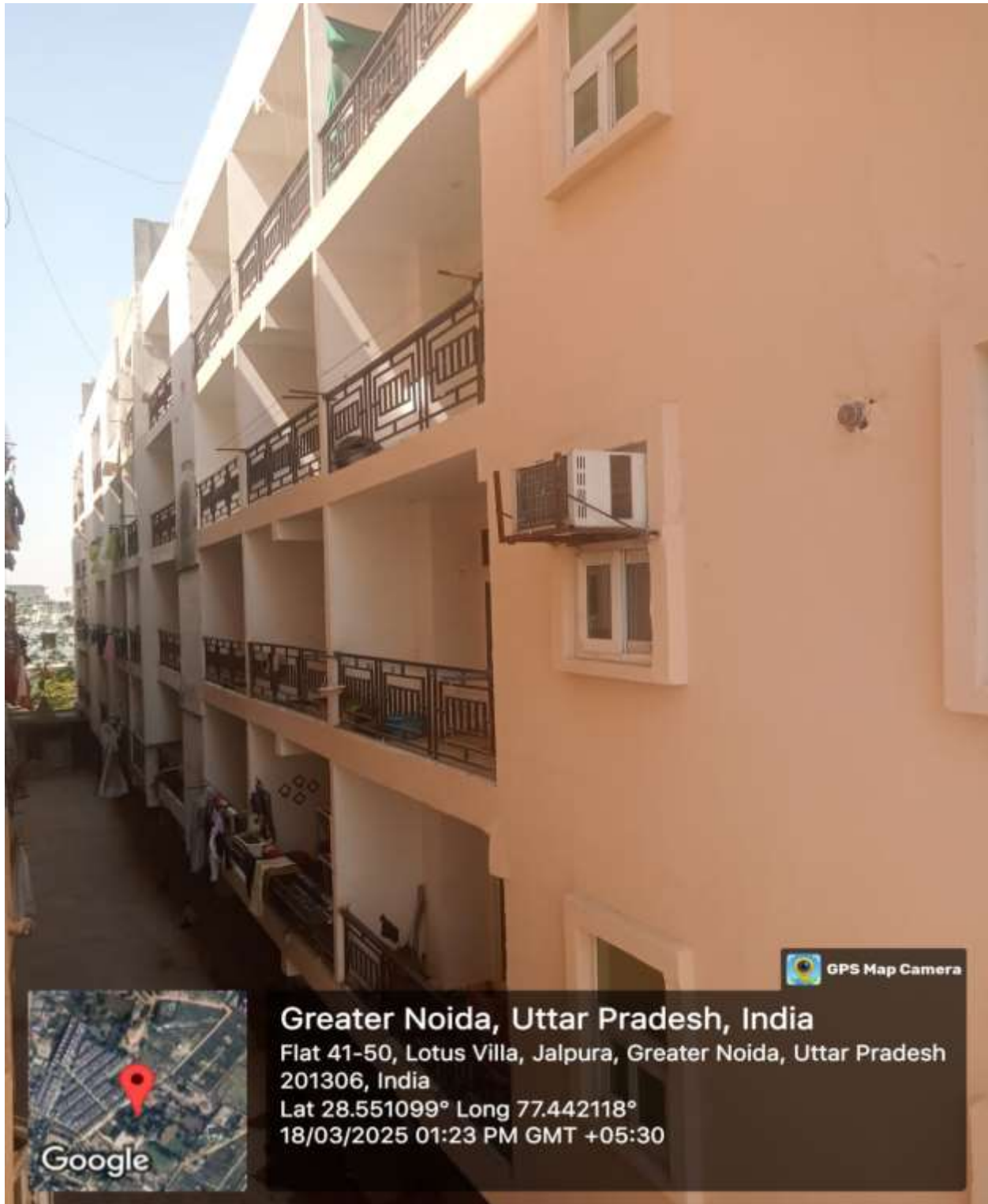
**Closer view of under construction illegal "Krishna Elite Homes" project at Jalpura village, Greater Noida West. Rampant construction is being carried out in absolute violation of the Orders of this Hon'ble Tribunal. Residential project with shops spread over a large area. Around 250 flats with 6 towers under construction. No NOC received from GNIDA. No CTE or CTO approved by UPPCB. Groundwater is being extracted. Buildings being constructed without any approved plan.**

**All these constructions are secretly being carried out during the night time.**



**Closer view of under construction illegal "Krishna Elite Homes" project at Jalpura village, Greater Noida West. Rampant construction is being carried out in absolute violation of the Orders of this Hon'ble Tribunal. Residential project with shops spread over a large area. Around 250 flats with 6 towers under construction. No NOC received from GNIDA. No CTE or CTO approved by UPPCB. Groundwater is being extracted. Buildings being constructed without any approved plan.**

**All these constructions are secretly being carried out during the night time.**



**Possession of flats in Krishna Homes, an illegal and unauthorized structure, being given to gullible buyers. The NPCL is also giving them electricity connections.**



**Possession of flats in Krishna Homes, an illegal and unauthorized structure, being given to gullible buyers. The NPCL is also giving them electricity connections.**

## नामी बिल्डर से परेशान लोग अवैध कालोनाइजरो के जाल में फंस रहे

ग्रेट गिग सिटीज्डर • नवम्बर

नगर: डेढ़ दशक बाद भी लाखों लोग नोएडा-रोने में आने पर से घबिहत हैं। एक अंकड़े के मुताबिक यह संछा खेन लख से अधिक है। नमी बिल्डरों को लूट से परेशान लोग अब अवैध कालोनाइजरो के जाल में फंस रहे हैं।

इमोण क्षेत्रों में एक दशक में कालोनाइजरो ने एक लख से अधिक फ्लैट बनाकर बेचे। फ्लैट की रजिस्ट्री फिन टैरो के हुई ले खरीदरों का बचोन और पुछत हो गय। नोएडा-रोने के अलग-अलग खंडों में अवैध

शहर	परियोजना	पुरी	अपुरी	अंसी	रजिस्ट्री
नोएडा	118	24	94	1,69,950	65,255
रोने	191	50	141	2,61,814	96,410

• लाखों लोगों को एक दशक में नहीं मिले फ्लैट

• ग्रामीण क्षेत्रों में एक दशक में एक लाख से अधिक फ्लैट बनाकर बेचे

कालोनाइजरो को 2,000 से अधिक परियोजनाओं में 70 हजार से अधिक फ्लैट निर्मावाधोन हैं। इनमें 75 प्रतिशत से अधिक बुकिंग हो चुकी हैं। ऐसे में पर खरीदर और बुरा तरा फंस सकते हैं।

यह दे वीरमपुद्द नगर में पर

खरीदरों का मुद्द सबसे ज्यद बढ़ा है। डेढ़ दशक से लोग यहाँ पर पर मिलने का इंतजार कर रहे हैं। नोएडा-रोने को 235 परियोजनाओं में 3.15 लख पर खरीदर अपने घर पर मलिकाना हक मिलने का इंतजार कर रहे हैं। कई मामले न्यायालय में हैं।

### आबादी का खसरा एक रजिस्ट्री अनेक

ग्रामीण क्षेत्रों में आबादी की जमीन का के स्थानीय निगरियों के लिए छोड़ी गई है। इस जमीन का खसरा एक है। यहाँ पर रजिस्ट्री का कई की गई है। ग्रामिण क्षेत्र में गूढ हाउसिंग परियोजनाओं में फ्लैट बाइस रजिस्ट्री का प्रवधान है जो ग्रामीण क्षेत्रों में भी अवैध रूप से की जा रही है। 100 गज की आबादी की जमीन पर बहुमजिला इमारतें बनाकर अलग-अलग लोगों को बेची गई है।

रासन, बरासन, ग्रामिण क्षेत्रों में कई जगहों पर खरीदरों को सिर्फ आवासीय निवासे के बड़े डेवलपर से उनका बरोस हो टूट गया। बिल्डर फ्लैट को कोमत तेज से बड़ी उसमें भी घर मिलने की खारंटो नहीं होने का फायदा अवैध कालोनाइजरो ने अच्छी

तरा से उठया है। नोएडा-रोने के अलग-अलग खंड में 2000 से अधिक परियोजनाओं में करोब 70 हजार फ्लैट 75 प्रतिशत बुकिंग के साथ तैयार हो चुके हैं। दिना नख्त उस डिए बन रहे बहुमजिला इमारतें: आबादी की जमीन

पर खरीदरों को समय पर उनका हक नहीं मिलता है। इसके लिए लगातार प्रदर्शन भी कर रहे हैं। अधिकतम खत कमिटी की लानु हुई निगरियों को भी बिल्डर नहीं मान रहे हैं। अपनी बगो को लेकर जस्ट जल-माल पर प्रदर्शन करेगे। -अभिषेक सिंह, जलन नगर

पर घर बनने के लिए जिला पंचायत से नक्का पास होत था। अब यहाँ जिला पंचायत नहीं है। ग्रामिण क्षेत्रों में बहुमजिला इमारतों के लिए नक्का पास करत नहीं हैं। ऐसे में यहाँ पर फिन नक्का पास किए हो बहुमजिला इमारत तैयार हो रही हैं।

Dainik Jagran newspaper, dated: 17.11.2024

**620**

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**Fwd: Additional Affidavit in O.A. No. 329/2024, Rajendra Tyagi vs. Union of India & Ors.**

1 message

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**AKASH VASHISHTHA** <akashvashishtha.official@gmail.com>

Tue, Mar 25, 2025 at 11:56 AM

----- Forwarded message -----

From: **AKASH VASHISHTHA** <akashvashishtha.official@gmail.com>

Date: Tue, 25 Mar 2025, 11:52

Subject: Additional Affidavit in O.A. No. 329/2024, Rajendra Tyagi vs. Union of India &amp; Ors.

To: bhanwar jadon &lt;bhanwar09jadon@gmail.com&gt;, &lt;bhanwar09@gmail.com&gt;, &lt;anupam@jsalaw.com&gt;, &lt;gigicgeorge.adv42@yahoo.in&gt;, &lt;gigicgeorge.adv42@yahoo.com&gt;, &lt;Deepesh@pslchambers.com&gt;, &lt;srinivas@svlawchambers.in&gt;, &lt;pradeepmisra@yahoo.com&gt;, &lt;Akshaygoswami0512@gmail.com&gt;

Dear Sir/Madam,

Please find Additional Affidavit in O.A. No. 329/2024, Rajendra Tyagi vs. Union of India &amp; Ors. attached.

Regards,

Akash Vashishtha  
(Advocate)

Ph. 9717006866

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 **Additional affidavit-2.pdf**  
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