

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
ORIGINAL APPLICATION NO. 85 OF 2025**

IN THE MATTER OF:-

JAGDISH RAGHAV

... APPLICANT

VERSUS

STATE OF HARYANA & ORS.

... RESPONDENTS

INDEX

S. NO.	PARTICULARS	PAGE NO.
1	Additional Affidavit filed on behalf of the Applicant	107-110
2	ANNEXURE A-1 Copy of the photographs of the encroachment by Respondents No. 6,9,10 and 13 on the Aravalli Plantation land	111-112
3	ANNEXURE A-2 Copy of the photograph showing waste dumping on Khasra No. 80/8 and 80/11 i.e. Aravalli Plantation land	113
4	ANNEXURE A-3 Copy of the photographs showing construction of road undertaken on Khasra No. 80/16, 81/11, 81/12, 81/13, 81/18, 81/19 and 81/20 which are Aravalli Plantation land	114-115
5	ANNEXURE A-4 Copy of the photographs of encroachment at Khasra No. 81/7, 80/16 and 81/13 by private persons	116-117

THROUGH





RITWICK DUTTA RAHUL CHOUDHARY SHREEPURNA DASGUPTA

COUNSELS FOR THE APPLICANT

N-73, Lower Ground Floor, Greater Kailash-i,

New Delhi-110048

Mobile no: 9312407881

Email: litigation@dclawchambers.com**PLACE: NEW DELHI****DATE: 26.03.2025**

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
ORIGINAL APPLICATION NO. 85 OF 2025**

IN THE MATTER OF:-

JAGDISH RAGHAV

... APPLICANT

VERSUS

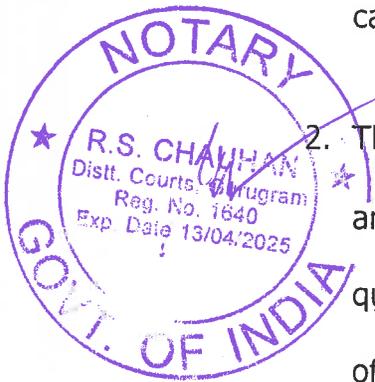
STATE OF HARYANA& ORS.

... RESPONDENTS

ADDITIONAL AFFIDAVIT FILED ON BEHALF OF THE APPLICANT

I, JagdishRaghav,s/o Mamraj Singh, aged about 75 years, r/o 136, Ghamroj, P.O. Ghamroj, Gurugram-122001,do hereby solemnly affirm and declare on oath as under:

1. That the Deponent is the Applicant in the above titled Original Application and conversant with the facts and circumstances of the case and competent to swear this Additional Affidavit.
2. That the above titled Original Application was filed under Section 14, 15 and 20 of the National Green Tribunal Act, 2010 raising substantial questions related to the environment arising out of the illegal plotting of land and construction activities in land marked for Aravalli Plantation Project in Village Ghamroj, Sohna Tehsil, Gurugram, Haryana. These parcels of land are protected under Forest (Conservation) Act, 1980 as per the as per the Hon'ble Supreme Court judgement dated 18.03.2004 in ***M.C. Mehta v. Union of India & Ors. [(2004) 12 SCC 118]***.
3. That vide order dated 3.03.2025, this Hon'ble Tribunal permitted the Applicant to place on record additional material in support of the Original Application. The relevant part of the order is reproduced below:



Sob. 40

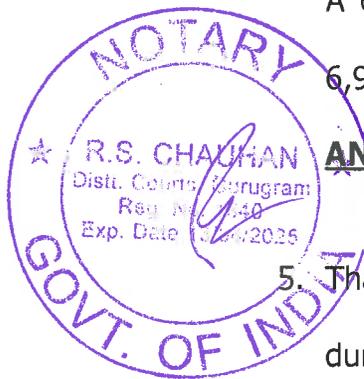
[Signature]

"5. The applicant is directed to serve the Respondents and file affidavit of service atleast one week before the next date of hearing. The Applicant is also permitted to place on record further material in support of the plea and supply it to the Respondents while sending a copy of the notice."

4. That the Deponent by way of this affidavit is bringing on record some of the photographs of the encroachments constructed on Aravalli Plantation land for the perusal of this Hon'ble Tribunal which are necessary for proper adjudication of the above-mentioned Application. The Deponent is annexing photographs of illegal structures constructed by some of the Respondents i.e. Respondent No. 6 to 13, on the Aravalli Plantation land. It is submitted that the Applicant has been able to collect photographs of only Respondent No. 6, 9, 10 and 13. The Applicant has been unable to collect photographs of other Respondents as the residents of the village oppose taking photographs and cause chaos, which can cause possible harm to the Applicant. The Forest Department may be in a better position to furnish more details about the encroachers.

A copy of the photographs of the encroachment by Respondents No. 6, 9, 10 and 13 on the Aravalli Plantation land is annexed herewith as

ANNEXURE A-1.



5. That the Applicant further submits photographs of waste being dumped on the Khasra No. 80/8 and 80/11 i.e. on the Aravalli Plantation land wherein the village residents have started unscientifically dumping solid waste mixed with other waste including construction and demolition waste on the forest land, since the past few months.

A copy of the photograph showing waste dumping on Khasra No. 80/8 and 80/11 i.e. Aravalli Plantation land is annexed herewith as

ANNEXURE A-2.

S.D. 40

[Handwritten signature]

6. That the Applicant also submits construction of road undertaken by the Gram Panchayat, Ghamrojon 80/16, 81/11, 81/12, 81/13, 81/18, 81/19 and 81/20 undertaken after 25.02.2025 i.e. after filing of the above-titled Original Application on 14.02.2025. Earlier, the roads present were unpaved road which have now been converted to concrete road.

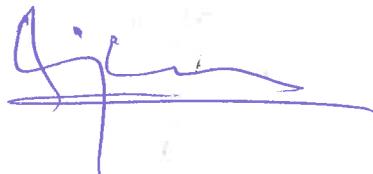
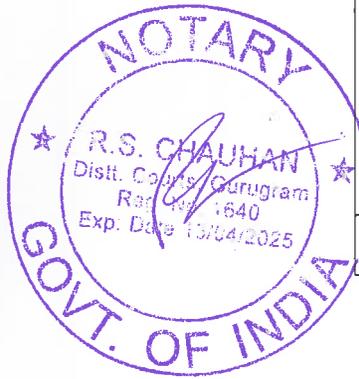
A copy of the photographs showing construction of road undertaken on Khasra No. 80/16, 81/11, 81/12, 81/13, 81/18, 81/19 and 81/20 which are Aravalli Plantation land is annexed herewith as **ANNEXURE A-3.**

7. That the Applicant further submits photographs of new constructions undertaken by private persons at Khasra No. 81/7, 80/16 and 81/13 after the above-mentioned Original Application has been filed, as detailed below:

S.No.	Details of the Encroachers	Khasra No. of the Aravalli Plantation
1	Ramesh s/o Omprakash	81/7
2	Omsat s/o Gyani Rakesh s/o Gyani Mukesh s/o Gyani (They are all related and have constructed properties on the same plot)	80/16
3	DevDutt s/o Dayaram	81/13

It is submitted that other fresh constructions have been taken by private persons at Aravalli Plantation land. However, the Applicant is unable to collect photographs of other private persons who have encroached upon the Aravalli plantation land, reason being that such persons oppose and argue with the Applicant and could turn violent at any point of time. The Forest Department may be in a better position to furnish more details about the encroachers.

S.O. 40

A copy of the photographs of encroachment at Khasra No. 81/7, 80/16 and 81/13 by private persons is annexed herewith as **ANNEXURE A-4.**

- 8. That the abovementioned photographs have been filed in compliance of order dated 3rd 03.2025 of this Hon'ble Tribunal to show the encroachment present on Aravalli Plantation land and hence, are necessary for proper adjudication of the matter. It is submitted that no prejudice will be caused to the Respondents if these documents are placed on record.
- 9. That the contents of the Additional Affidavit filed by the Applicant are true and correct and nothing material has been concealed therefrom.



[Signature]
DEPONENT

VERIFICATION

Verified on this 26th day of March 2025 at Gurgaon that the contents of the present Affidavit are true and correct to my knowledge and no part of it is false and nothing material has been concealed therefrom.

S.O. 407

[Signature]
DEPONENT



ATTESTED
[Signature]
 Ram Avtar Singh Chauhan
 Advocate & Notary
 GURUGRAM
 3/25

ANNEXURE A-1

Following photographs show encroachment done on Aravalli Plantation land by some of the Respondents

Respondent No. 6 Mahesh Singh | Khasra No. 81/15



Respondent No. 9- Devendra Singh | Khasra No. 81/15



Respondent No. 10 Krishna Singh & Ompal Singh | Khasra No. 67/1



Respondent No. 13- Ravindra Singh | Khasra No. 81/11



ANNEXURE A-2

Presence of waste dumping site on Khasra No. 80/8 and 80/11 that is Aravalli Plantation land



ANNEXURE A-3

New Roads have been constructed after 25.02.2025 on Khasra No. 80/16, 81/11, 81/12, 81/13, 81/18, 81/19 and 81/20 which are Aravalli Plantation land





ANNEXURE A-4

Following are the photographs of encroachment done at Khasra No. 81/7, 80/16 and 81/13 by private persons:

Ramesh s/o Omprakash at 81/7



Omsat, Rakesh and Mukesh s/o Gyani at 80/16



Dev Dutt s/o Dayaram at 81/13

