

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI****M.A. No. 70/2023****IN****ORIGINAL APPLICATION NO. 105/2023****IN THE MATTER OF:**

ML Dhiman

...Applicant

versus

State of Punjab &amp; Ors.

...Respondent

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Filed through


Shikher Deep Aggarwal/ Sanjukta Kaushik  
Counsel for Respondent No.3**Luthra and Luthra Law Offices India**103, Ashoka Estate, Barakhamba Road,  
New Delhi-110001.Email: [sdaggarwal@luthra.com](mailto:sdaggarwal@luthra.com)

Mob: 9873042047

New Delhi

Dated: 13.07.2024

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI**  
**M.A. No. 70/2023**

**IN**

**ORIGINAL APPLICATION NO. 105/2023**

**IN THE MATTER OF:**

ML Dhiman

...Applicant

versus

State of Punjab & Ors.

...Respondent

**ADDITIONAL AFFIDAVIT BY RESPONDENT NO. 3 ("PURE AND CURE  
HEALTH CARE PVT. LTD.")**

I, Sanjay Rai, the authorized representative of Respondent No. 3 having its registered office at: 305, Mohan Place, L.S.C, Block – C, Saraswati Vihar, Delhi – 110034, do hereby solemnly affirm under oath and state as follow:

1. That the Respondent No. 3, Pure And Cure Healthcare Private Limited, has diligently complied with all regulatory requirements and has successfully obtained renewals of its Consent to Operate (CTO) under both the Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974. The renewed Air CTO, bearing certificate number CTOA/Renewal/SAS/2024/ 25546676, and the renewed Water CTO, bearing certificate number CTOW/Renewal/SAS/2024/25546692, were both issued on 28/06/2024 and are valid until 31/12/2024. These renewals were granted by the Punjab Pollution Control Board after thorough review of Respondent No. 3's compliance with environmental regulations and its commitment to sustainable operations. The



copy of the renewed consents to operate are annexed herewith and marked as **ANNEXURE A (COLLY)**.

2. That the Respondent No. 3 has deposited environmental compensation totalling Rs.13,00,000/- (Rupees Thirteen Lakhs only) as directed by the Punjab Pollution Control Board (PPCB). PPCB has also encashed the Bank Guarantees of the Respondent amounting to Rs. 10 Lakhs on 20.11.2023. These payments were made without prejudice to its rights and contentions as available in law. Throughout this process, Respondent No. 3 has remained compliant with the directives issued by the PPCB.
3. That Respondent No. 3 is actively involved in Corporate Social Responsibility (CSR) activities. The company has undertaken several initiatives to contribute positively to the community and the environment. These activities include organizing health camps, supporting educational programs, and participating in local environmental conservation efforts. Through these CSR initiatives, Respondent No. 3 demonstrates its commitment to social and environmental responsibility, aiming to create a positive impact in the areas where it operates.
4. As a responsible corporate entity, Respondent No. 3 has taken proactive measures to ensure comprehensive compliance with all applicable environmental regulations. In furtherance of this commitment, Respondent No. 3 to further strengthen the safeguards has engaged independent third-party auditors to conduct a thorough review of its environmental compliance practices. This audit encompasses all aspects of the company's operations, including but not limited to air and water pollution



control measures, waste management procedures, and adherence to the conditions stipulated in the Consent to Operate. The detailed report of this third-party audit is currently being finalized and Respondent No. 3 would be filing the said report once it is received. This initiative demonstrates Respondent No. 3's dedication to transparency, continuous improvement, and its commitment to maintaining the highest standards of environmental stewardship.



**VERIFICATION**

I, Sanjay Rai, the authorized representative of Respondent No. 3, do hereby verify that the contents of this affidavit are based on records and information of Respondent No. 3 and are true to the best of my knowledge and belief.

Verified on 13<sup>th</sup> July, 2024 at New Delhi.



*Shikha Deep Aggarwal*  
 01/761/2012  
 Identify the deponent  
 who signed before me

*[Signature]*  
**ATTESTED**  
 NOTARY PUBLIC



13 JUL 2024

**ANNEXURE -A: (COLLY)**

**PUNJAB POLLUTION CONTROL BOARD**  
 Zonal Office-1, Vatavaran Bhawan, Nabha Road, Patiala – 147001  
 Website:- www.ppcb.gov.in



Office Dispatch No : \_\_\_\_\_ Registered/Speed Post \_\_\_\_\_ Date: \_\_\_\_\_  
 Industry Registration ID: *R12SAS21124* Application No : *25546676*

To,  
 Vinayak Bhat  
 Village Sundran, Derabassi  
 Derabassi, Mohali-140507

Subject: Renewal of consent to operate granted under section 21 of the Air (Prevention & Control of Pollution) Act, 1981

**1. Particulars of Consent to Operate under Air Act, 1981 granted to the industry**

Consent to Operate Certificate No.	<i>CTOA/Renewal/SAS/2024/25546676</i>
Date of issue :	<i>28/06/2024</i>
Date of expiry :	<i>31/12/2024</i>
Certificate Type :	<i>Renewal</i>
Previous CTO No. & Validity :	<i>CTOA/Fresh/PBIP/SAS/2024/2403247012</i> <i>From:15/03/2024 To:30/06/2024</i>

**2. Particulars of the Industry**

Name & Designation of the Applicant	<i>Vinayak Bhat, (Vp-operation)</i>
Address of Industrial premises	<i>Pure And Cure Healthcare Private Limited, Village: Sundran, Mubarakpur, Derabassi, Sas Nagar-140507</i>
Capital Investment of the Industry	<i>24175.0 lakhs</i>
Category of Industry	<i>Red</i>
Type of Industry	<i>Drugs and Pharmaceuticals</i>
Scale of the Industry	<i>Large</i>
Office District	<i>Sas Nagar</i>

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*Pure And Cure Healthcare Private Limited, Village: Sundran, Mubarakpur, Derabassi, Sas Nagar, 140507*

Page 1

*[Signature]*  
**TRUE COPY**

All the term and conditions same as mentioned in the consent no. CTOA/Fresh/PBIP/SAS/2024/2403247012 dated 15/3/2024 (valid upto 30/6/2024), is hereby extended upto 31/12/2024. This extension letter may be appended with the original consent letter issued to the industry and subsequent extension letters and additional conditions that:

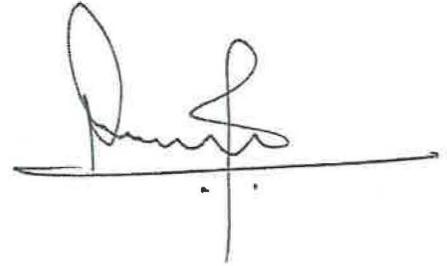
- 1) This consent is being issued to the industry subject to the orders/judgment of Hon'ble NGT in the matter of M.A. No. 70/2023 in O.A no. 105/2023 titled as M.L Dhiman v/s State of Punjab. The industry shall be bound to comply with directions/orders issued by Hon'ble NGT in this matter.
- 2) The industry shall operate and maintain its STP, ETP, MEE and ATFD properly, at the times.
- 3) The industry shall comply with the conditions of the Environmental Clearance granted by SEIAA under the EIA notification dated 14/9/2006.
- 4) The industry shall stick to the water balance submitted alongwith the online application form.
- 5) The industry shall reuse the entire RO Permeate back into its process and shall adhere to ZLD, at all times.
- 6) The industry shall use only treated domestic effluent after STP, onto land for plantation within its premises.
- 7) The industry shall ensure that no problem related to air and water pollution is being caused by the unit due to its operation and no public complaints are received by the Board in this regard.
- 8) The industry shall not discharge any effluent at any unauthorized place by any unauthorized means i.e. shall not discharge any wastewater outside its premises or in any drain/ inland surface waters/ drain/ choe/nallah / onto land for stagnation or outside its premises, at any time, under any circumstances.
- 9) The industry has been approved by the Board from pollution angle and the industry shall obtain the statutory clearances / permissions from all other concerned departments.
- 10) The adequacy/ efficacy of the pollution control arrangements shall be the sole responsibility of the industry and the industry shall be bound to implement/ upgrade its pollution control arrangements as per the discretion of the Board to achieve the prescribed emission/ effluent standards, as amended from time to time.
- 11) The industry shall ensure the compliance of provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, Environment (Protection) Act, 1986 and/ or any other environmental law applicable to him and Rules, Circulars & Directions issued by the Board from time to time.
- 12) This consent to operate is being issued to the project proponent based upon the documents/ information submitted by it along with the online application form. The Board would be at liberty to take penal action against the industry its responsible/ concerned person(s) in case information/ document is detected as incorrect/ false/ misleading at any point of time, without any opportunity of Personal Hearing.
- 13) In case the project proponent fails to comply with the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, Environment (Protection) Act, 1986 and/ or any other environmental law applicable to the project and Rules, Circulars & Directions issued by the Board from time to time, action as deemed fit shall be taken against the industry.
- 14) The industry shall devise the ways & means to minimize the generation of all kind of wastes through REDUCE, REUSE and RECYCLE activities. The generated waste, if any, shall be properly handled and managed as per the provisions of the Municipal Solid Waste Rules 2016 in an environmentally sound manner.
- 15) The industry shall develop the vermicomposting/ composting to manage the biodegradable solid waste. The industry not throw, burn or bury any solid wastes in open, outside premises or in drain/ water bodies.
- 16) The industry shall ensure that there are no usages of plastic carry bags and single use plastic/ thermocol disposable items such as water bottles/ water pouches/ water cups, plates, forks, spoons, straw etc. and single use decorating material made of plastic-thermocol or any other non-biodegradable material in the premises.
- 17) The industry shall perform/ promote its Corporate Environment Responsibility (CER) activities as well as use of alternatives of single use plastics (SUP) and awareness to discourage use of plastic.
- 18) The industry shall carry out awareness and activities for the themes/ action points identified under Mission LiFE (Lifestyle for the Environment) by Ministry of Environment, Forests and Climate Change given at the website (<http://missionlife-moefcc.nic.in>).

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28/06/2024

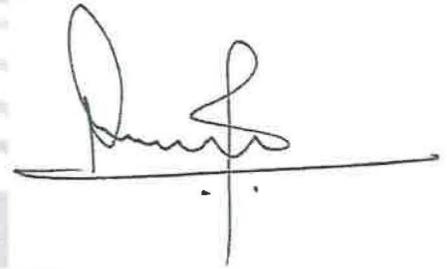
**(Rajeev Gupta)**  
**Environmental Engineer**  
*For & on behalf*  
*of*  
**(Punjab Pollution Control Board)**

**Endst. No.:**

**Dated:**

A copy of the above is forwarded to the following for information and necessary action please:

- 1) Environmental Engineer, Punjab Pollution Control Board, Regional Office, SAS Nagar



28/06/2024

**(Rajeev Gupta)**  
**Environmental Engineer**  
*For & on behalf*  
*of*  
**(Punjab Pollution Control Board)**

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*Pure And Cure Healthcare Private Limited, Village: Sundran, Mubarakpur, Derabassi, Sas Nagar, 140507*

*Page 3*

  
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**PUNJAB POLLUTION CONTROL BOARD**  
 Zonal Office-1, Vatavaran Bhawan, Nabha Road, Patiala – 147001  
 Website:- www.ppcb.gov.in



Office Dispatch No :

Registered/Speed Post

Date:

Industry Registration ID: R12SAS21124

Application No : 25546692

To,

Vinayak Bhat  
 Village Sundran, Derabassi  
 Derabassi, Mohali-140507

Subject: Renewal of consent to operate granted under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974

1. Particulars of Consent to Operate under Water Act, 1974 granted to the industry

Consent to Operate Certificate No.	CTOW/Renewal/SAS/2024/25546692
Date of issue :	28/06/2024
Date of expiry :	31/12/2024
Certificate Type :	Renewal
Previous CTO No. & Validity :	CTOW/Fresh/PBIP/SAS/2024/2403313855 From:15/03/2024 To:30/06/2024

2. Particulars of the Industry

Name & Designation of the Applicant	Vinayak Bhat, (Vp-operation)
Address of Industrial premises	Pure And Cure Healthcare Private Limited, Village: Sundran, Mubarakpur, Derabassi, Sas Nagar-140507
Capital Investment of the Industry	24175.0 lakhs
Category of Industry	Red
Type of Industry	Drugs and Pharmaceuticals
Scale of the Industry	Large
Office District	Sas Nagar

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Pure And Cure Healthcare Private Limited, Village: Sundran, Mubarakpur, Derabassi, Sas Nagar, 140507

Page 1

4  
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All the term and conditions same as mentioned in the consent no. CTOW/Fresh/PBIP/SAS/2024/2403313855 dated 15/3/2024 (valid upto 30/6/2024), is hereby extended upto 31/12/2024. This extension letter may be appended with the original consent letter issued to the industry and subsequent extension letters and additional conditions that:

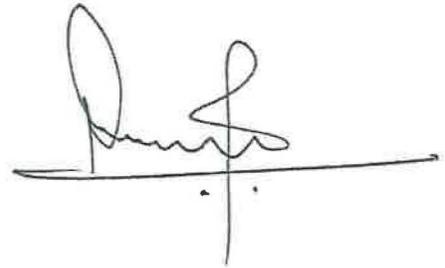
- 1) This consent is being issued to the industry subject to the orders/judgment of Hon'ble NGT in the matter of M.A. No. 70/2023 in O.A no. 105/2023 titled as M.L Dhiman v/s State of Punjab. The industry shall be bound to comply with directions/orders issued by Hon'ble NGT in this matter.
- 2) The industry shall operate and maintain its STP, ETP, MEE and ATFD properly, at the times.
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28/06/2024

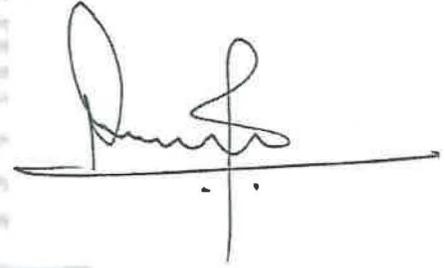
**(Rajeev Gupta)**  
**Environmental Engineer**  
*For & on behalf*  
*of*  
**(Punjab Pollution Control Board)**

**Endst. No.:**

**Dated:**

A copy of the above is forwarded to the following for information and necessary action please:

- 1) Environmental Engineer, Punjab Pollution Control Board, Regional Office, SAS Nagar



28/06/2024

**(Rajeev Gupta)**  
**Environmental Engineer**  
*For & on behalf*  
*of*  
**(Punjab Pollution Control Board)**

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*Pure And Cure Healthcare Private Limited, Village: Sundran, Mubarakpur, Derabassi, Sas Nagar, 140507*

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# VAKALATNAMA 370

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI  
M.A. NO. 70/2023  
IN  
ORIGINAL APPLICATION NO. 105/2023

ML Dhiman

...Applicant

Versus

State of Punjab &amp; Ors.

...Respondents

KNOW ALL to whom these present shall come that I, Sanjay Rai, Authorised Representative of Respondent No.3 (Pure and Cure Health Care Pvt. Ltd.) in the abovenamed case, do hereby appoint

Faisal Sherwani /Shikher Deep Aggarwal/ Aditya Vikram/ Sanjukta Kaushik  
(D/761/2012)  
Luthra and Luthra Law Offices India  
Counsel for the Respondent No.3  
Email – sdaggarwal@luthra.com  
Ph – 9873042047

(herein after called the advocate/s) to be my /our Advocate in the above- noted case authorise him :-  
To send notices and representations on our behalf.

To act, appear and plead in the above- noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign, file, verify and present pleadings, appeals cross-objections or petitions for executions review revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subjects to payment to fees for each stage.

To file and take back documents, to admit and /or deny the documents of opposite Party.

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings.

To deposit, draw and receive money, cheques, cash and grant receipts here of and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign. the power of attorney on our behalf.

And I/we undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all Intents and purposes.

And I/we undertake that I/we or my/ our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.

And I/we undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself

And I/we the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/ us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution or the said case until the same is paid up. The fee settled is only for the above case and above Court. I/we hereby agree that once the fees is paid, I/we will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more them 3 years the original fee shall be paid again by me/us.

IN WITNESS WHERE/OF I/we do hereunto set my / our hand to these presents the contents of which have been understood by me/us on this 12<sup>th</sup> day of July 2024.

Accepted subject to the terms of the fees.

Advocate



*Sanjay Rai*  
D/761/2012

*Sanjukta Kaushik*  
[AS/946/2021]

*Aditya Vikram*  
D/1400/2009

*Sanjay Rai*  
D/1935/2013



**PURE & CURE HEALTHCARE PRIVATE LIMITED**

10

CIN: U24232DL2005PTC268385

Regd. Office: 305, MOHAN PLACE, L.S.C., BLOCK-C, SARASWATI VIHAR, DELHI-110034

Email Id: [dharamvir.malik@akums.net](mailto:dharamvir.malik@akums.net); Phone No: 011- 69041000

**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF BOARD OF DIRECTORS OF PURE AND CURE HEALTHCARE PRIVATE LIMITED HELD ON 27<sup>TH</sup> OCTOBER, 2023 AT DELHI**

**AUTHORISATION FOR LEGAL SUITS**

"RESOLVED THAT in supersession to earlier resolutions passed in this regard Mr. Gopi Nath Sahu, Mr. Satya Prakash, Mr. Himanshu Saxena and Mr. Rama Shanker, Directors of the Company, Mr. Sanjeev Jain, Mr. Sandeep Jain, Mr. D.C Jain, Ms. Arushi Jain, Mr. Sumeet Sood, Mr. Sanjay Rai, Mr. Ankit Sharma, Mr. Harshvardhan Garg, Ms. Shruti Dhingra, Mr. Shantanu and officer / authorized signatory of the Company, be and are hereby severally authorized to institute, file, pursue, execute any suit, application, complaint or any other proceedings including evidence in any court, tribunal or authority in respect of or matters arising out of company's business and for this purpose to sign, execute, institute, attest, amend, pursue, defend, withdraw & compromise any complaint, suit, application, petition, appeal, affidavit or other documents that may be necessary and to verify the same, to issue and accept service of notice by the Company, and to defend any suit or other proceedings that may be filed by or against the Company and to appoint advocate, counsel, arbitrator, solicitor, agent, authorized by authority letter or power of attorney to some other person(s) for the aforementioned purposes; and generally to do all other acts and things necessary in relation to the matter(s) as stated above.

RESOLVED FURTHER THAT Mr. Akshay Surya, Mr. Mohit Vashisht, Mr. Raman Yadav, Mr. Khyali Dutt Sharma and Mr. Samandar Singh Dhakad officers/ Authorized Signatories of the Company be and are hereby severally authorized to pursue & defend any suit, application, complaint or any other proceedings including evidence in any court, tribunal or authority in respect of or matters arising out of company's business and for this purpose to sign documents that may be necessary; and that may be filed by or against the company and to preserve the interests of the Company in the best possible manner.

RESOLVED FURTHER THAT authority to any of the persons under this item of agenda shall be valid, if and so long as the person(s) is in the employment or authorized signatory of the Company".

**Certified True Copy****For Pure and Cure Healthcare Private Limited**

Pure and Cure Healthcare Pvt. Ltd.



Gopi Nath Sahu Director  
Director  
DIN: 02877564



**Dheeraj Kumar**

---

**From:** Lakshya Sharma  
**Sent:** Saturday, July 13, 2024 12:08 PM  
**To:** Dheeraj Kumar  
**Subject:** FW: M. L. Dhiman v. State of Punjab  
**Attachments:** Additional Affidavit R 3.pdf

---

**From:** Lakshya Sharma  
**Sent:** Saturday, July 13, 2024 11:58 AM  
**To:** 'fastnewsindiazmangehr@gmail.com' <fastnewsindiazmangehr@gmail.com>  
**Cc:** 'dc.mhl@punjab.gov.in' <dc.mhl@punjab.gov.in>; 'ppcbsee\_zpl@yahoo.com' <ppcbsee\_zpl@yahoo.com>; 'raman.legal@akums.in' <raman.legal@akums.in>; 'mspcb@gmail.com' <mspcb@gmail.com>; 'cs@punjab.gov.in' <cs@punjab.gov.in>; 'rajpanjwani339@gmail.com' <rajpanjwani339@gmail.com>; Faisal Sherwani <FSherwani@LUTHRA.COM>; Shikher Deep Aggarwal <sdaggarwal@LUTHRA.COM>; Sanjukta Kaushik <skaushik@luthra.com>; Aditya Vikram <avikram@luthra.com>  
**Subject:** M. L. Dhiman v. State of Punjab

Dear All,

We represent Respondent No. 3, i.e. **AKUMS Life Sciences Ltd. (Now Known as Pure and Cure Healthcare Pvt. Ltd.)** in the above captioned matter. Please see attached the following document on the behalf of Respondent No. 3.

- i) Additional Affidavit on the behalf of Respondent No. 3

This is served you by the way of Electronic Email Service

**Regards,**

**Mr. Raj Panjwani (Senior Adv.)/ Mr. Faisal Sherwani (Adv.)/ Mr. Shikher Deep Aggarwal (Adv.)**  
**(Counsels for Respondent No. 3)**