

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI

(In Original Application No. 793 of 2022)

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Date: 27-02-2025

Place: Ludhiana



(Er. Kapil Dev)

(Applicant No. 2)

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Mobile: 9872007872

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI

(In Original Application No. 793 of 2022)

Council of Engineers & ors. .... Applicants

Vs.

State of Punjab & ors ..... Respondents

**Additional Submission by Applicant No. 2 regarding Misleading facts produced in the case by MCL by projecting the impugned building in Public Park as Library of MCL.**

Hon'ble sir

Respectfully showeth

The Applicant No. 2 humbly submits as under:

1. That one RTI Application was filed with PIO of Library branch of MCL by One Sh. Gaurav Taneja s/o Gurcharan Singh on 29-10-2024 regarding the information pertaining to the impugned Library building constructed in the Park. However, the PIO failed to provide the information in time. After filing the First Appeal by the Applicant, the PIO of Library Branch, MCL provided the information vide letter No. 276/Library dated 25-02-2025 for all the Points from Sr. No. 1 to 9 as under:

**“Whereas you have demanded the information with regard to Library Maharana Pratap, G.T. Road, Opposite Manju Cinema, near Dholewal Chowk, Ludhiana, but the same is not a Library of Municipal Corporation, Ludhiana”.**

The Copy of RTI dated 29-10-2024 is produced herewith as **Annexure PX-15** and copy of information dated 25-02-2025 provided in Punjabi by PIO Library Branch (along with its Translated copy attested by Notary Public) is produced herewith as **Annexure PX-16**.

2. That from the information provided by PIO, Library Branch of MCL, it is crystal clear that such building was never constructed for public utility but just to please the Political Parties & private organisation/society by going against the directions of Hon'ble Supreme Court, this Hon'ble Tribunal as well as Hon'ble Punjab & Haryana High Court. It is pertinent to humbly submit here that the Hon'ble Punjab & Haryana High Court has already pleased to passed the directions against unauthorized Public as well as Private Buildings constructed on Public Land with MCL as one of the Respondents but the MCL, without taking legal opinion from the legal advisors encroached upon the Park Area by constructing the impugned building just to please the Politicians and Private organization/society.
3. That the facts regarding the building not being Library came in front of the Applicants only after getting the copy of information received by Sh. Gaurav Taneja, however, the MCL has always being projecting the impugned illegal building as Public Library and even failed to provide the actual information to the Joint Committees as well as the Learned Court Commissioner Sh. Amit Shukla. Thus, the MCL has not only delayed the implementation of orders dated 04-10-2024 for restitution of impugned Park, but has also wasted the time of this Hon'ble Tribunal since long just to hide the illegal act done by its concerned officials.

Keeping in view of the above produced additional submission & earlier facts; the Applicant humbly prays this Hon'ble Tribunal to accept the prayer as submitted in O.A. and issue directions of initiation of proceedings u/s 28 of NGT Act against the

Respondent MCL and impose hefty Environmental compensation/fine on encroachers as per law.

Place: Ludhiana  
Dated: 27-02-2025



Er. Kapil Dev  
(Applicant No. 2)

To  
The Public Information Officer,  
Municipal Corporation,  
Ludhiana.

29/10/24  
Date : 29.10.2024

- 1) Name of the Applicant: Gourav Taneja S/o Late Sh.Gurcharan Singh
- 2) Mailing Address: House No. B-33-1607, New Ashok Nagar-A,  
Ludhiana-141008.
- 3) Whether a citizen of India: Yes
- 4) Details of Information Sought
  - 1) Whether the library is known as Maharana Pratap, G.T Road,  
Opposite Manju Cinema near Dholewal Chowk, Ludhiana is  
situated in the park.
  - 2) Whether the library is Maintained by Municipal Corporation  
Ludhiana or by any other person.
  - 3) The Status of the library.
  - 4) Number of books and the journals in the library. How many  
newspapers and periodicals are subscribed by the library.
  - 5) Whether any librarian has been employed and how many  
employees are employed in the library. If yes how much paid  
salary each person.
  - 6) Whether the Municipal Corporation is charging any fee from  
the Library for displaying Advertisements all around the  
building and the park.
  - 7) The list of members of the library.
  - 8) The working hours of the library. Whether it opens on the  
holidays or not.
  - 9) Whether any record is being maintained at the library.

**(Kindly Provide all the Certified Copies under the R.T.I Act 2005 of  
all the documents. The applicant is ready to pay the charges.)**

- 7) Type of Information required: General
- 8) A fee of Rs.10/- is being deposited vide postal order no.63F 659699

Signature of the Applicant

*G Taneja*

Mobile No. 8146989700

ਦਫਤਰ ਨਗਰ ਨਿਗਮ, ਲੁਧਿਆਣਾ।

ਵਲੋਂ:

ਪੀ.ਆਈ.ਓ - ਲਾਇਬ੍ਰੇਰੀ ਬ੍ਰਾਂਚ  
ਨਗਰ ਨਿਗਮ, ਲੁਧਿਆਣਾ।

ਵੱਲ:

✓ ਸ੍ਰੀ ਗੌਰਵ ਤਨੇਜਾ ਪੁੱਤਰ ਸ੍ਰੀ ਗੁਰਚਰਨ ਸਿੰਘ  
ਬੀ-33, ਨਿਊ ਅਸ਼ੋਕ ਨਗਰ, ਲੁਧਿਆਣਾ-141008

ਨੰ.....276/ Library

ਮਿਤੀ...25/02/2025

ਵਿਸ਼ਾ: ਆਰ.ਟੀ.ਆਈ. ਐਕਟ 2005 ਅਧੀਨ ਸੂਚਨਾ ਦੇਣ ਸਬੰਧੀ।

ਹਵਾਲਾ: ਦਫਤਰ ਫਸਟ ਐਪੀਲੇਟ ਅਥਾਰਟੀ ਜੀ ਦੇ ਪੱਤਰ ਨੰ: 18/ਐਫ.ਏ.ਏ/ਡੀ ਮਿਤੀ 22/01/25 ਅਤੇ  
37/ਐਫ.ਏ.ਏ/ਡੀ ਮਿਤੀ 31/01/25 (ਅਪੀਲ ਕੇਸ ਨੰ: 434/2024 ਅਤੇ 435/2024) ਦੇ ਹਵਾਲੇ  
ਵਿਚ।

ਉਪਰੋਕਤ ਸਬੰਧੀ ਆਪ ਨੂੰ ਦੱਸਿਆ ਜਾਂਦਾ ਹੈ ਕਿ :

ਲੜੀ ਨੰ 01: ਆਪ ਵਲੋਂ ਜਿਸ ਲਾਇਬ੍ਰੇਰੀ Maharana Prapat, G.T. Road, Opposite Manju Cinema  
near Dholewal Chowk, Ludhiana. ਬਾਰੇ ਜਾਣਕਾਰੀ ਮੰਗੀ ਗਈ ਹੈ, ਉਹ ਨਗਰ ਨਿਗਮ ਲੁਧਿਆਣਾ ਦੀ  
ਲਾਇਬ੍ਰੇਰੀ ਨਹੀਂ ਹੈ।

ਲੜੀ ਨੰ 02 ਤੋਂ 09: ਇਸ ਦਾ ਜਵਾਬ ਲੜੀ ਨੰ: 01 ਅਨੁਸਾਰ ਹੈ।



ਨੰ.....

ਮਿਤੀ...../2025

ਉਪਰੋਕਤ ਦਾ ਉਤਾਰਾ ਮਾਣਯੋਗ ਫਸਟ ਐਪੀਲੇਟ ਅਥਾਰਟੀ ਜੀ ਨੂੰ ਜਾਣਕਾਰੀ ਹਿੱਤ ਭੇਜਿਆ ਜਾਂਦਾ ਹੈ।

*mele sharma*

ਪੀ.ਆਈ.ਓ - ਲਾਇਬ੍ਰੇਰੀ ਬ੍ਰਾਂਚ  
ਨਗਰ ਨਿਗਮ, ਲੁਧਿਆਣਾ।

*ਸ਼ਰੀ*

ਪੀ.ਆਈ.ਓ - ਲਾਇਬ੍ਰੇਰੀ ਬ੍ਰਾਂਚ  
ਨਗਰ ਨਿਗਮ, ਲੁਧਿਆਣਾ।

Verified to be true Photo Copy  
Notary Public, Ludhiana, (Pb.)

27 FEB 2025

True Translation from Punjabi to English LanguageOffice of Municipal Corporation, Ludhiana

From:-

P.I.O. Library Branch,  
Municipal Corporation, Ludhiana.

To,

Sh. Gaurav Taneja son of Gurcharan Singh,  
Resident of B-33, New Ashok Nagar-A, Ludhiana-141008.

No.276/ Library

Dated 25/02/2025.

Subject:- For giving information under Right to Information Act-2005.

In Reference: With reference to Letter no.18/F.A.A./D dated 22/01/25 from the Office of First Appellant Authority and 37/F.A.A/D dated 31/01/25 (Appeal Case no.434/2024 and 435/2024).

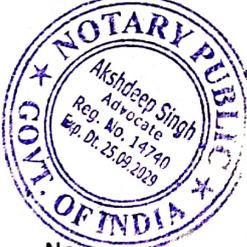
It is stated you regarding the information sought above that:-

Serial no.01.

Whereas you have demanded the information with regard to Library Maharana Pratap, G.T. Road, Opposite Manju Cinema, Near Dholewal Chowk, Ludhiana, but the same is not a library of Municipal Corporation, Ludhiana.

Serial no.02 to 09.

The reply of this is same as according to serial no.01.



No.....

Sd./- (In English)

P.I.O.- Library Branch,  
Municipal Corporation, Ludhiana.

Dated ...../2025

Copy to :- The copy of above said is sent to Hon'ble First Appellant Authority for further information.

Sd./-

P.I.O.- Library Branch,

Municipal Corporation, Ludhiana.

True Translation From  
Punjabi/Hindi/Urdu into English  
Notary Public, Ludhiana (Pb.)  
27 FEB 2025

AT PRINCIPAL BENCH, NEW DELHI

(in O.A. No. 793 of 2022)

AFFIDAVIT

Council of Engineers & ors. .... Applicants

vs.

State of Punjab & ors. .... Respondents

Affidavit regarding Additional Submission by Er. Kapil Dev (aged 48 years) s/o Sh. Jagdish Chander, r/o #186-E, BRS Nagar, Ludhiana in O.A. No. 793 of 2022.

RESPECTFULLY SHOWETH:

I, the above mentioned deponent do hereby solemnly affirm and declare as under:-

1. That the deponent (Applicant No. 2) along with others is one of the petitioners had filed O.A. No. 793 of 2022 before this Hon'ble National Green Tribunal.
2. That the Applicant is submitting the Additional Submission dated 27-02-2025 in the said Original Application from Para No. 1 to 3 along with Annexures for kind consideration by this Hon'ble Tribunal.



Place: Ludhiana  
Dated: 27.02.2025

Verification:

Verified that the contents of para 1 and 2 of this affidavit are true and correct. No part of it is false, and nothing material has been kept concealed therefrom.

*Certified that the affidavit SPA/GPA has been readover & explained to the deponent executant who seemed directly to understand the same at the making above statement.*

*[Signature]*  
DEPONENT

Place: Ludhiana  
Dated: 27.02.2025

I know the Deponent/Executants personally and he/she has Signed/Thumb Impression in my presence

ATTESTED AS IDENTIFIED

*[Signature]*  
DEPONENT

NOTARY PUBLIC,  
LUDHIANA (PB)

27 FEB 2025

277  
27-02-2025

823



Kapil Arora &lt;aroraengineers@gmail.com&gt;

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**Service of Document - Additional Submission by Applicant No. 2 in O.A. 793 of 2022 adjudged before the Hon'ble NGT**

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**Arora Engineers** <aroraengineers@gmail.com>

Thu, Feb 27, 2025 at 5:10 PM

To: secy.lg@punjab.gov.in, dc.ldh@punjab.gov.in, commissionerml@gmail.com,  
ldh\_it\_2009@yahoo.co.in, Lodhiclub.ldh@gmail.com, info@sacredheartschoolludhiana.com,  
amit.shukla@lexweb.in

Dear sir

PFA scanned copy of Additional Submission by Applicant in O.A. No. 793 of 2022 as Service of Documents. Next Date of hearing is on 03-03-2025 before the Hon'ble National Green Tribunal

Regards

Er. Kapil Dev  
Applicant No. 2  
in O.A. 793 of 2022  
Mob. 9872007872



**Additional Submission dated 27-02-2025 by Applicant No. 2 in O.A. No. 793 of 2022.pdf**  
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