

**Yogesh Maini & anr. Vs The State of Punjab through the Principal Secretary of
Local Government Department & ors.**

**Affidavit of Yogesh Maini (aged 41 years) s/o Late Sh. Kapil Bhushan Maini
r/o #678/1, Prem Nagar, Shiv Mandir Road, Civil Lines, Ludhiana.**

RESPECTFULLY SHOWETH:

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

1. That the deponent, who is one of the Applicants (in person) in O.A. No. 293 of 2023 filed with this Hon'ble National Green Tribunal.
2. That the contents of paras no. 1 to 4 of the accompanying Rejoinder are true and correct to my knowledge.



Place: Ludhiana
Dated: 20.09.2024

certified that the affidavit has been read over & explained to the deponent executant..... who seemed correct to understand the same at the time of making there of.

Yogesh Maini
DEPONENT

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.

Place: Ludhiana
Dated: 20.09.2024

Yogesh Maini
DEPONENT

ATTESTED AS IDENTIFIED

Pankaj
Pankaj Advocate
Oath Commissioner (Ldh.)

20 SEP 2024

3551-8842-0635
I Know deponent He/She
Signed in my presence.

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

(In O.A. No. 293 of 2023)

Yogesh Maini & anr. Petitioners

Vs.

State of Punjab & ors. Respondents

Additional submission in the form of Rejoinder by Applicant No. 1 on continuous Environment damage being done by solid fixing interlocking tiles/cement concrete even after 06-09-2024:

1. **By Chairman of Improvement Trust Ludhiana by continuing to fix solid interlocking tiles.**
2. **by Municipal Commissioner Ludhiana by continuing to lay cement concrete along riad side by covering 100% areas as well as**

without leaving proper space around trees by deliberately & repeatedly defying the orders of this Hon'ble Tribunal, Environment Norms & provisions of IRC SP 50: 2013, orders of this Hon'ble Tribunal and provisions of Section 26 of NGT Act 2010

Hon'ble sir,

Respectfully sheweth,

The Applicant humbly submit as under:

1. That even after date of hearing held on 06-09-2024, the Respondent No. 2 and Respondent No. 3 both are still continuing to fix Solid interlocking

tiles/cement concrete in 100% area along roadsides (Non-permeable tiles) without leaving space of One metre in radius around the trees by going against the orders of this Hon'ble Tribunal in O.A. No. 62 of 2021 (case title Er. Kapil Dev vs. State of Punjab & ors.) for MCL, LIT & GLADA. Such an act is against the provisions of Section 26 of NGT Act and the Head of Department is liable to be prosecuted and punished accordingly.

2. That the interlocking tiles have been fixed above road level which results into water logging on roads. Four Photographs clicked on 04-09-2024 (with GPS location) depicting interlocking tiles fixed & also being fixed within prohibited area (One Meter radius) at Shaheed Bhagat Singh Nagar by defying orders of this Hon'ble Tribunal by Respondent No. 3 (Chairman of Ludhiana Improvement Trust) are produced herewith as **Annexure P-8**.
3. That the Municipal Commissioner of Ludhiana (Respondent No. 2) has also continued to lay cement concrete in 100% area in towards rear side of its own Zone-C Office at Gill Road as well as along roadsides during last 15-20 days and such illegal act is still going on as on date too. Such an act by Respondent No. 2 is just to allow Roadside vendors to encroach upon the roadsides which will cause traffic jams and deteriorate the Environment further. Fourteen **photographs** depicting cement concrete laid and being laid along road sides and that too including cement concrete within one meter radius of trees are produced herewith as **Annexure P-9**.
4. That despite directions dated 10-03-2021 issued by this Hon'ble Tribunal in O.A. 62 of 2021, the Respondents No. 2 as well as Respondent No. 3 have not even removed interlocking tiles fixed within the prohibited area around

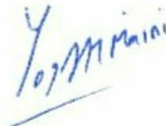
number of trees as claimed by it. The present Act of both the respondents clearly depicts that they are submitting false affidavits to save their skins only.

PRAYER

Keeping in view of the above, the Applicants humbly pray this Hon'ble Tribunal to kindly accept our prayer as submitted in Original Application and issue directions to PPCB to initiate proceedings against Respondent No. 2 & 3 under the provisions of Section 26 of NGT Act, 2010 for repeatedly defying orders of this Hon'ble Tribunal.

Date: 20-09-2024

Place: Ludhiana

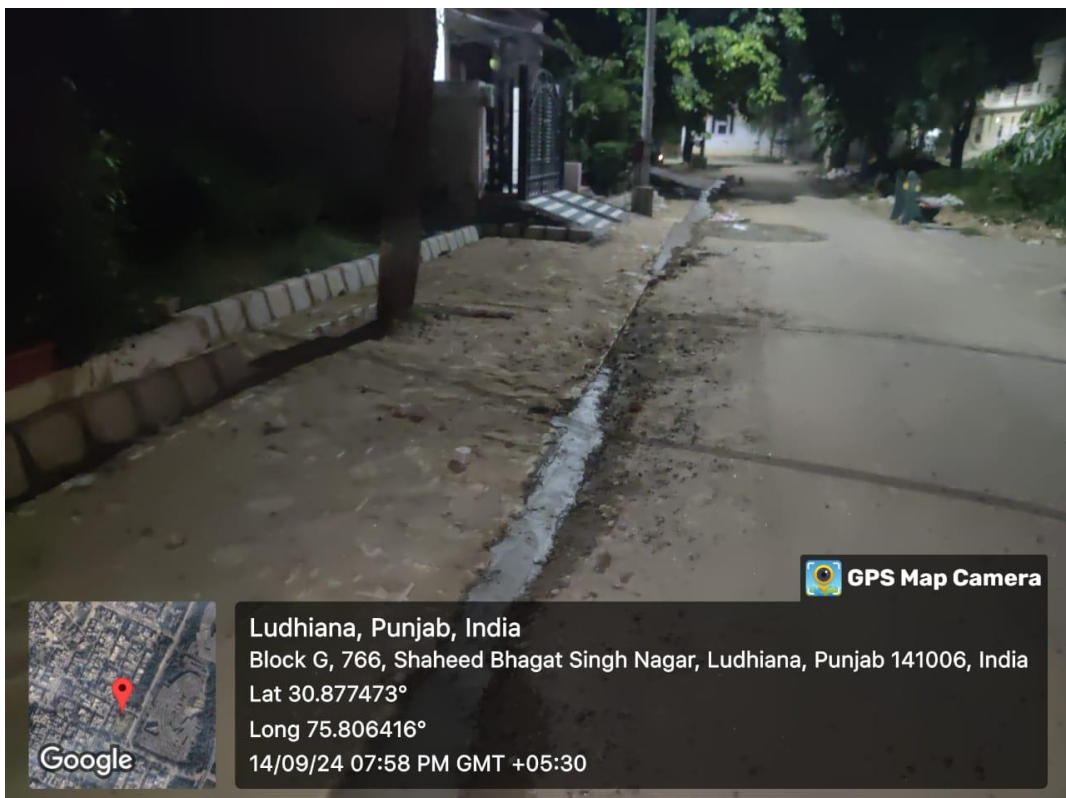
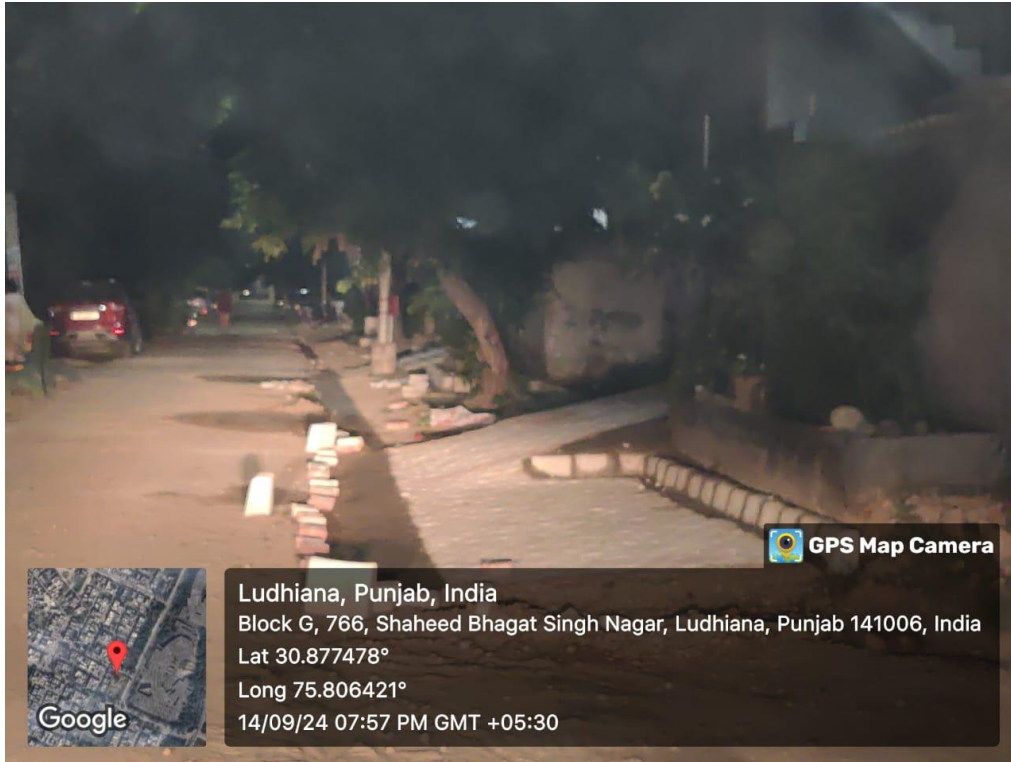


Yogesh Maini

(Petitioner No. 1)

ANNEXURE P-8

Four Photographs clicked on 14-09-2024 (with GPS location) depicting solid interlocking tiles fixed in 100% area & including prohibited area (One Meter radius) at Shaheed Bhagat Singh Nagar by Respondent No. 3 (Chairman of Ludhiana Improvement Trust)

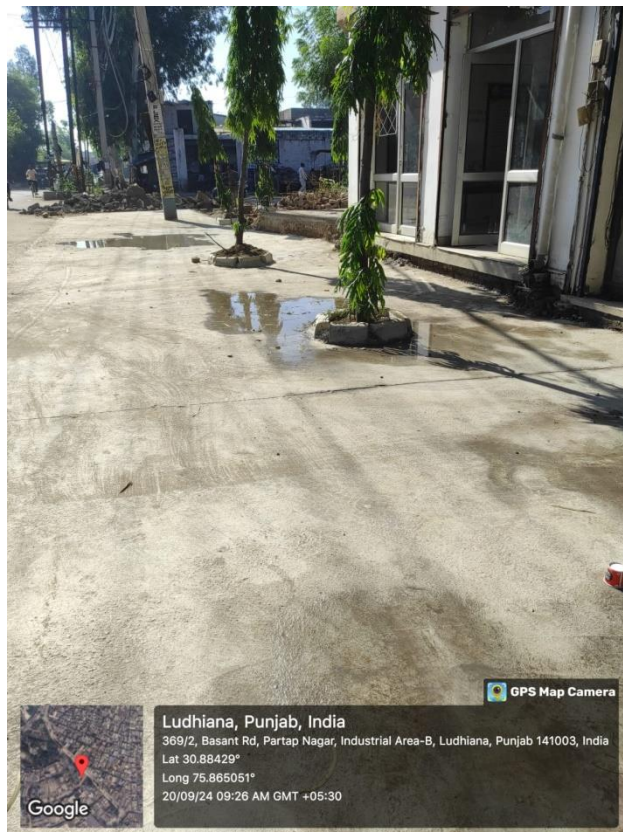




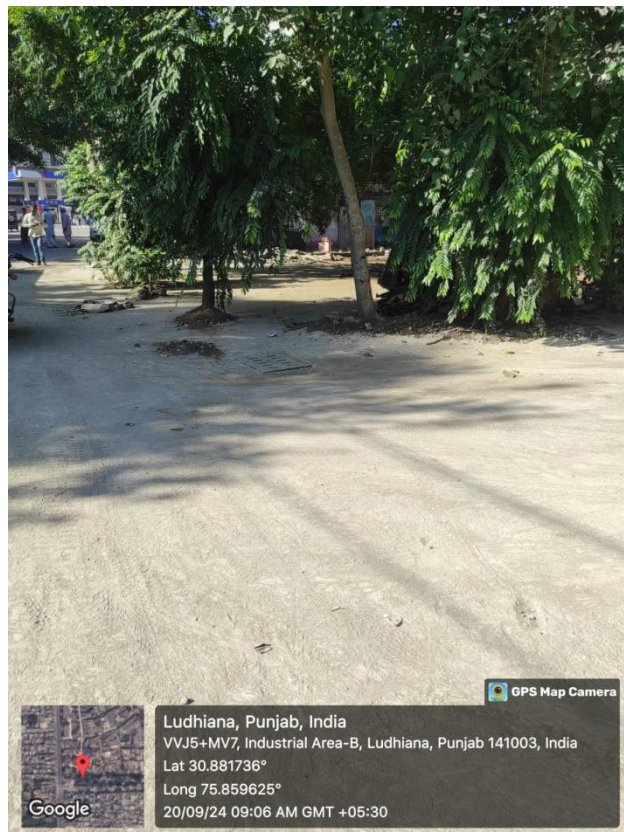
ANNEXURE P-9

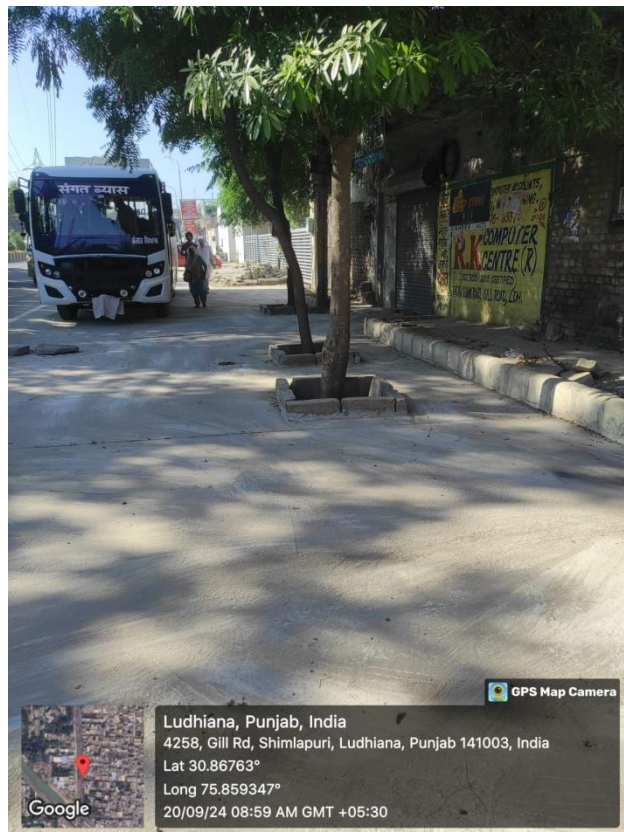
Fourteen Photographs clicked on 14-09-2024 (with GPS location) depicting solid interlocking tiles fixed in 100% area & including prohibited area (One Meter radius) at Shaheed Bhagat Singh Nagar by Respondent No. 3 (Chairman of Ludhiana Improvement Trust)

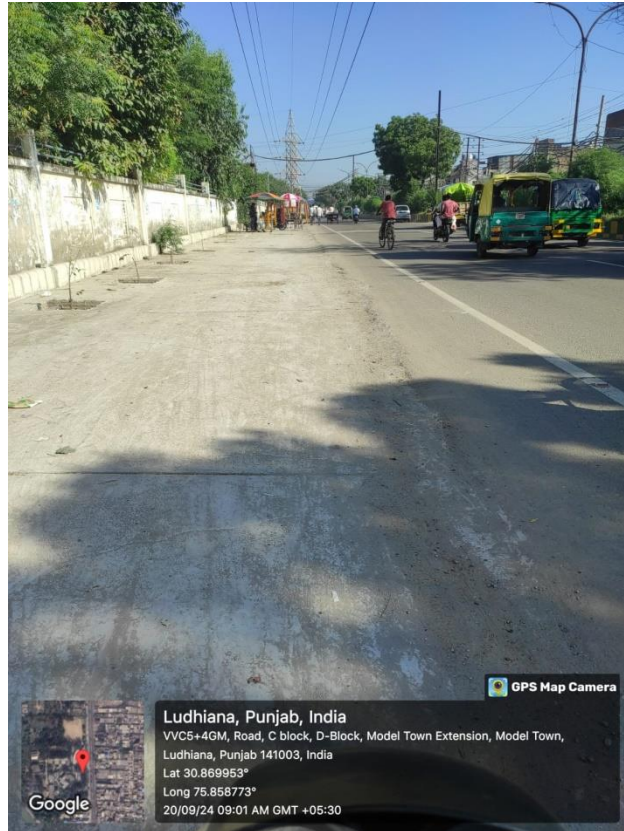














ZONE-C BUILDING
OF MCL

