

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

OA No. 949 OF 2024

IN THE MATTER OF:

Laxmi Narain ... Applicant

Versus

State of UP ... Respondents

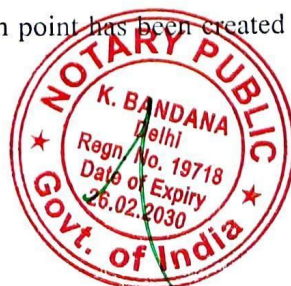
AFFIDAVIT OF THE APPLICANT

I, Laxmi Narain, S/o Shri Bhule Ram, 47, DSG Pocket, Dilshad Garden, East Delhi, Delhi-110095 also residing at Village- Chikambarpur, Pargana Loni, Tehsil & Distt. Ghaziabad, Uttar Pradesh, presently at New Delhi, do hereby depose and state on oath as under:

1. That the deponent is the applicant in the present matter and as such competent to swear the present additional affidavit.
2. That the Municipal Corporation in its affidavit dated 09.11.2024 has deposed as under:

4. It is humbly submitted that the said premises had been identified and established as a secondary point (secondary garbage collection center) by Ghaziabad Municipal Corporation a few years back. Garbage is regularly collected and lifted at the said place, but many times there is a delay in lifting the garbage due to public protest, rain and other reasons at the processing site of Ghaziabad Municipal Corporation. However as soon as the obstruction is over, the work of lifting the garbage is done regularly again promptly and readily

3. That the Municipal Corporation Ghaziabad has admitted that the secondary collection point has been created by the corporation, however, in contrast to



the rules, Corporation states that the same does not require approval of the UPPCB, the relevant portion is extracted as under:

8. Moreover permission from State Pollution Control Board is not required for setting up a secondary garbage collection centre/secondary point as there is no storm water drain near the site in question and there is no residential area near the site either
 9. It is submitted that solid waste is regularly collected and lifted for the said premises. Additionally, insecticides like antilarva etc. are sprayed under the supervision of the Chief Cleaning and Instrumental Inspector/Area Cleaning and Food Inspector.
4. That the apparent falsity of the corporation for cleaning it regularly, as is clear from the photographs annexed with this affidavit.
 5. That it is incorrect that there is no storm drain adjacent to the secondary collection point. The storm drain is clearly visible in the photographs which flows just adjacent to the collection point.
 6. That the depositions given by the Municipal Commissioner in the affidavit are false and that the deponent requests the Hon'ble Tribunal to initiate appropriate proceedings against the Municipal Commissioner for deposing falsely before the Hon'ble Tribunal.

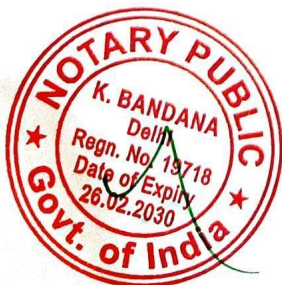
Laxmi Narain
DEPONENT

VERIFICATION:

Verified on this, the 3rd day of March, 2025 at New Delhi that no contents of the present affidavit are incorrect and nothing material has been concealed herefrom.

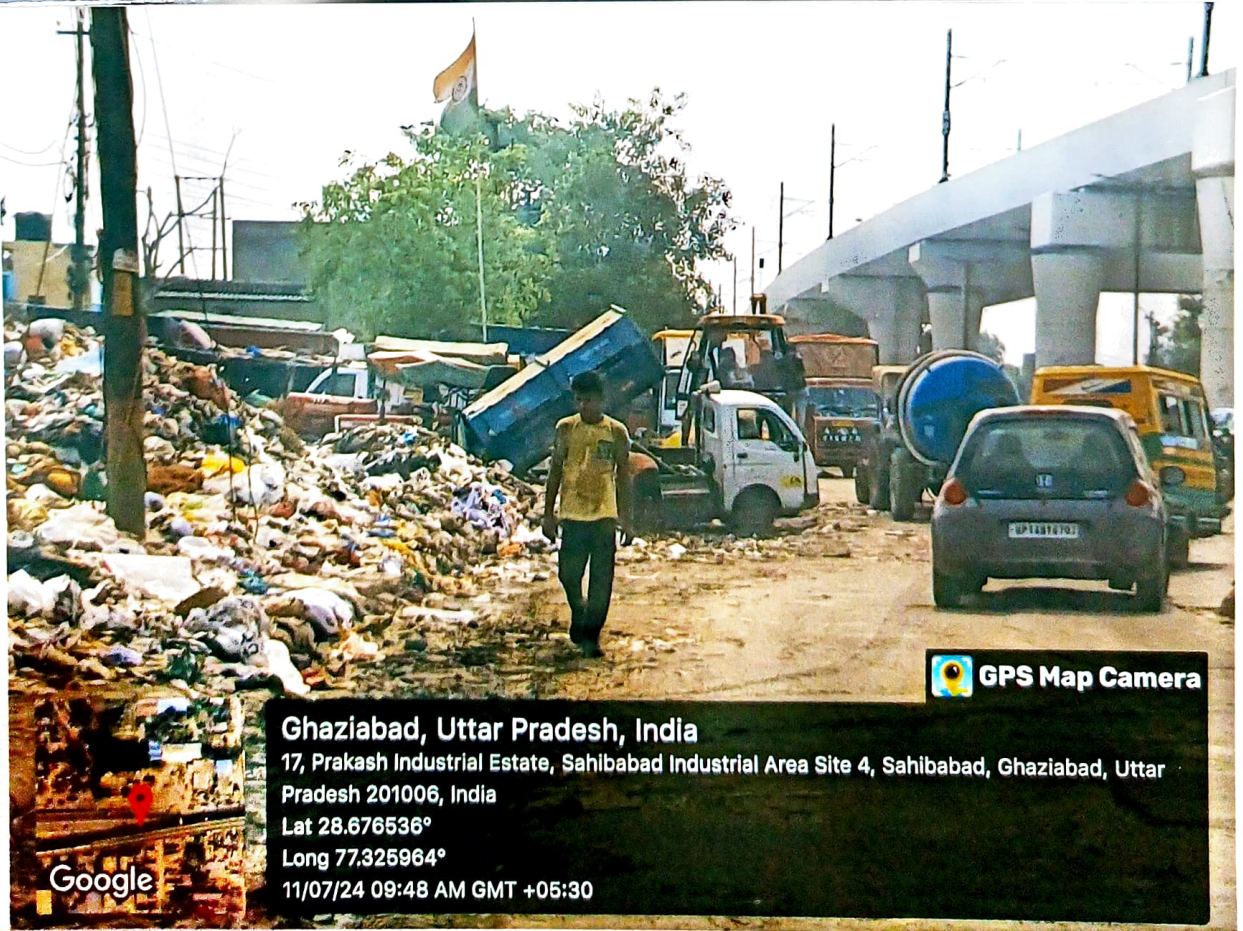
03 MAR 2025

Laxmi Narain
DEPONENT




ATTESTED
NOTARY PUBLIC DELHI
Govt. of India
Mob.: 9854768498

IDENTIFIED





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Ghaziabad, Uttar Pradesh, India


17, Prakash Industrial Estate, Sahibabad Industrial Area Site 4, Sahibabad, Ghaziabad, Uttar Pradesh 201006, India

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Long 77.325947°

11/07/24 09:48 AM GMT +05:30



 **GPS Map Camera**

Ghaziabad, Uttar Pradesh, India

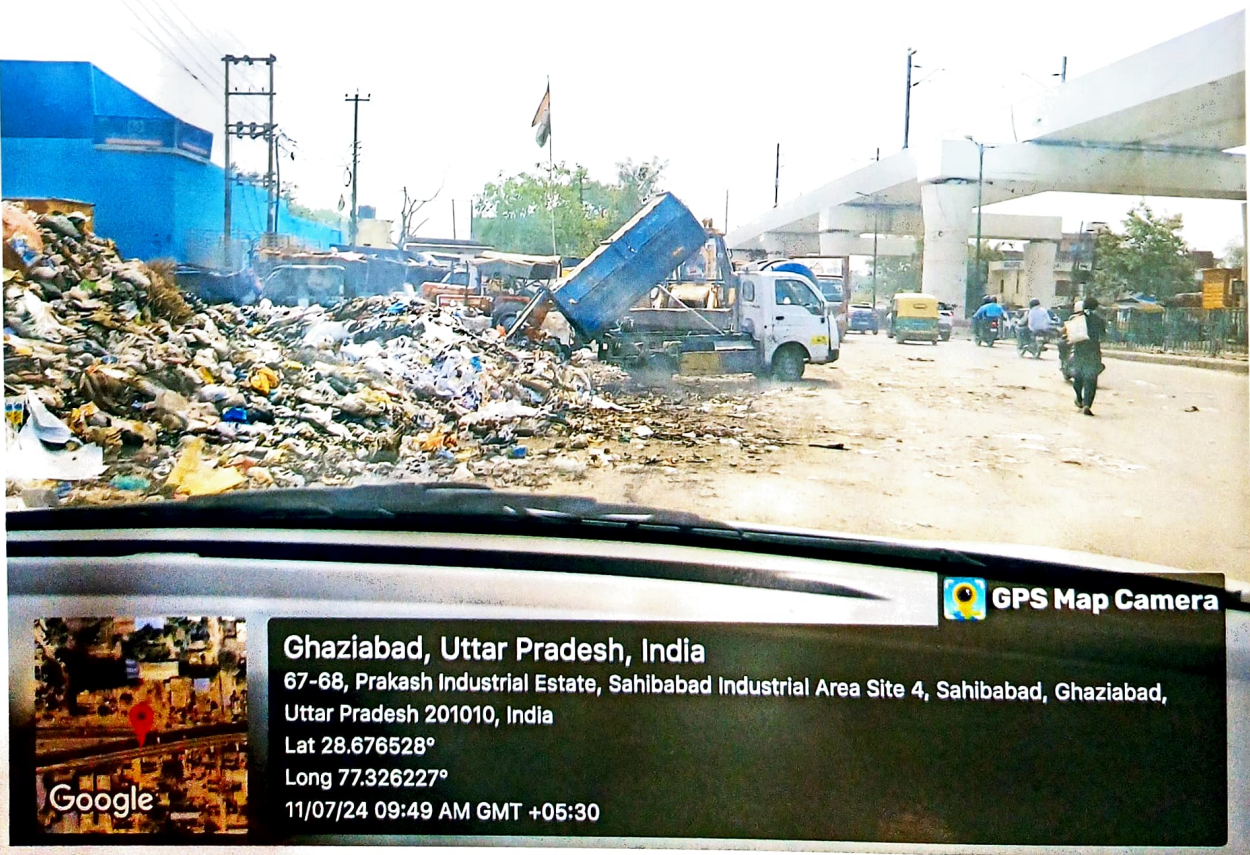
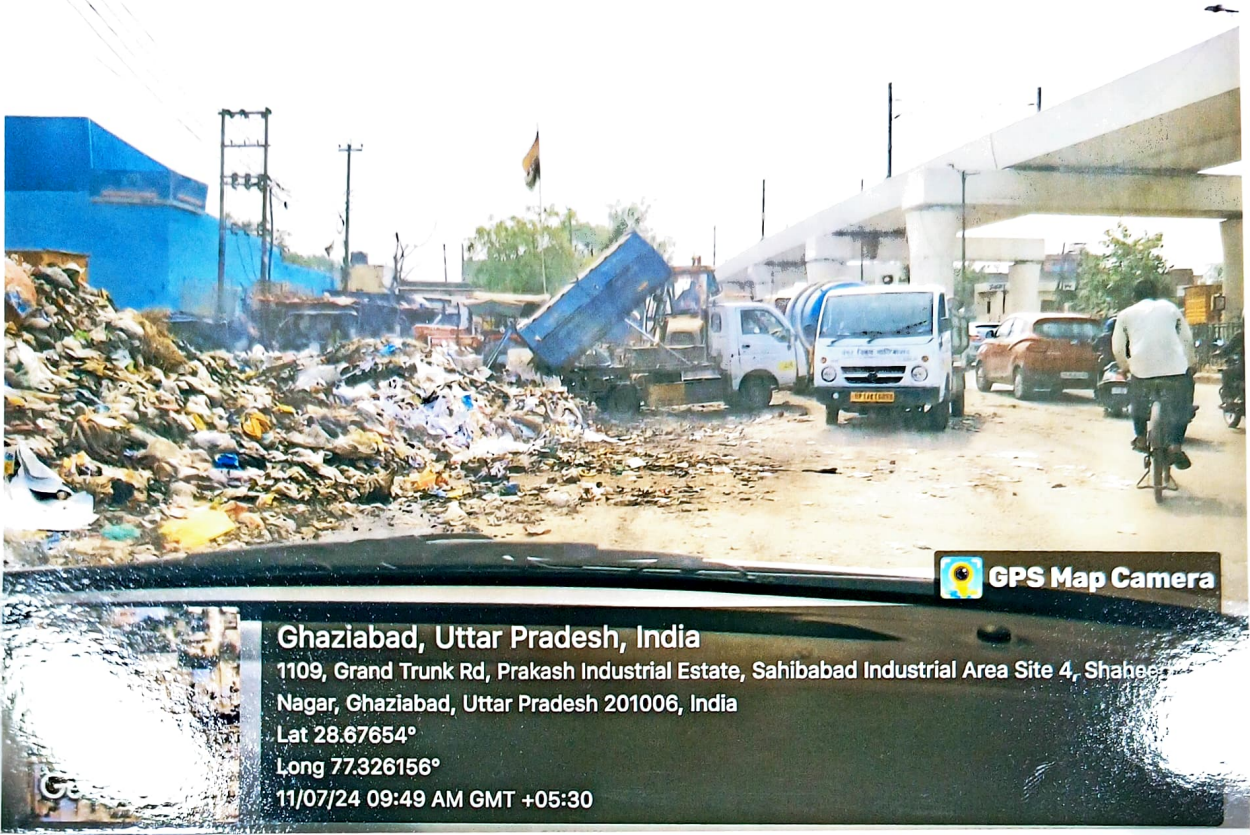
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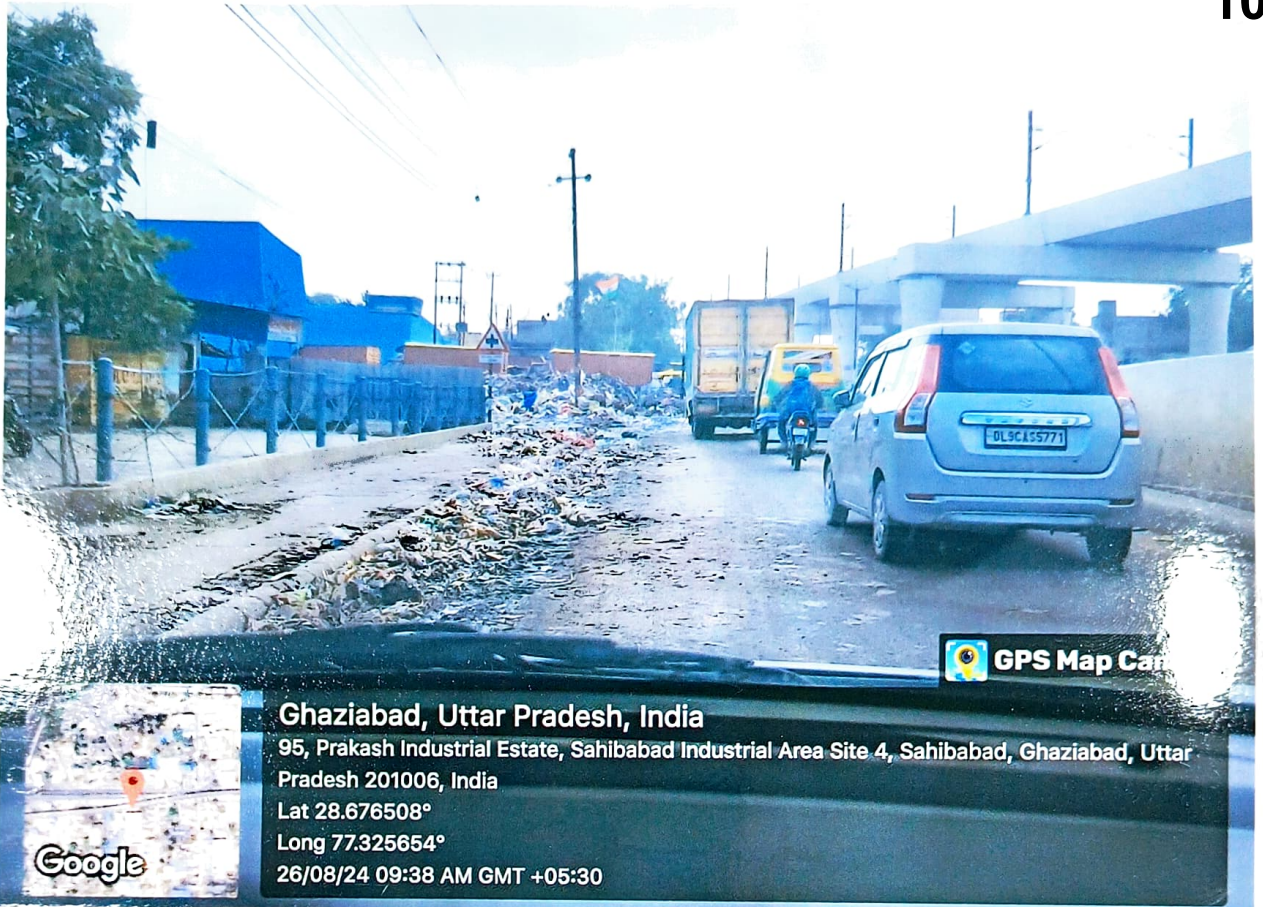
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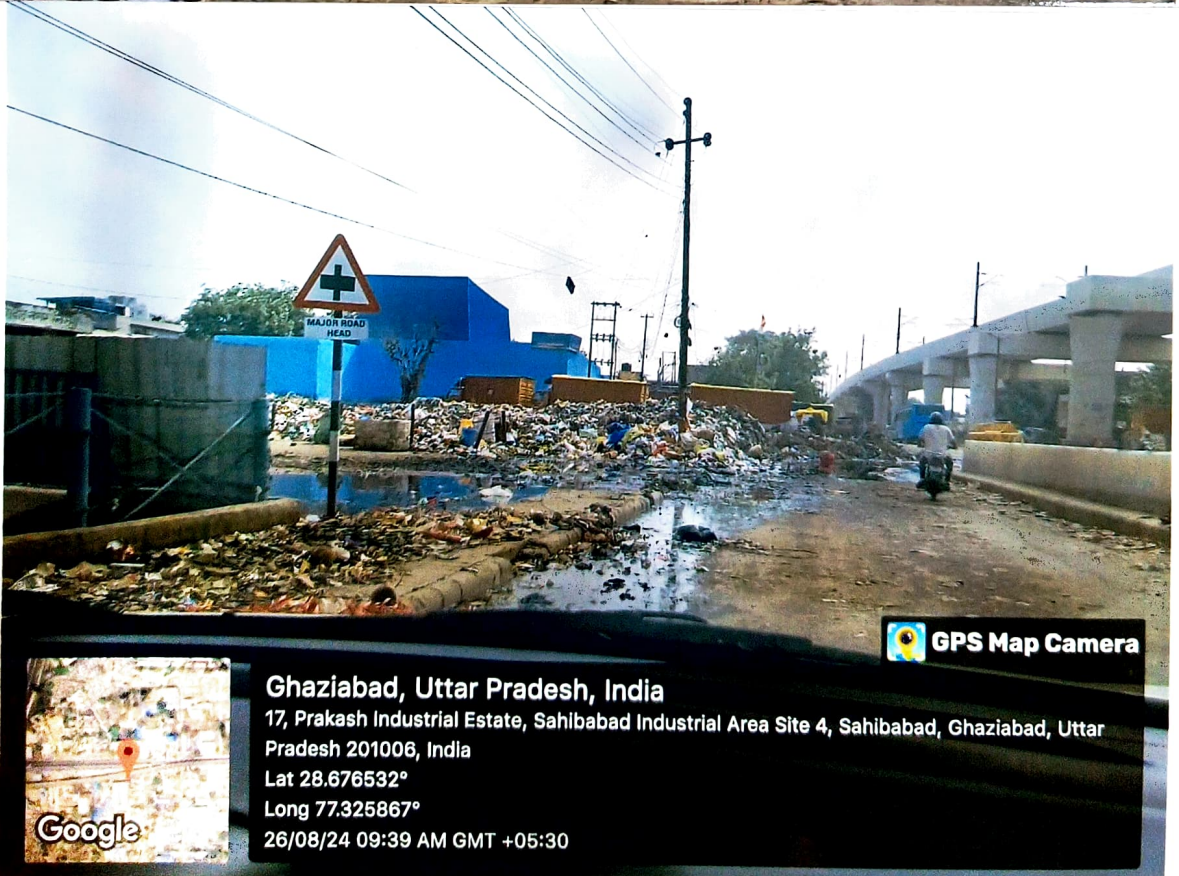
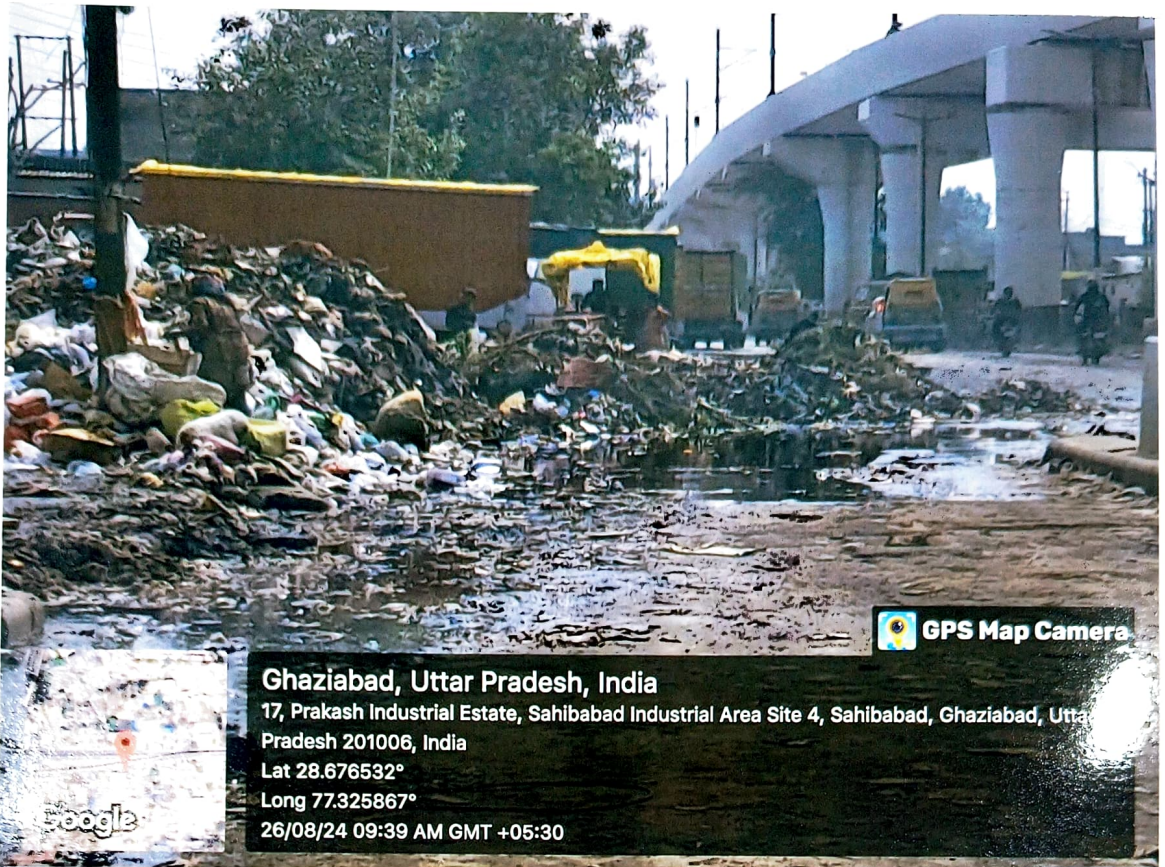
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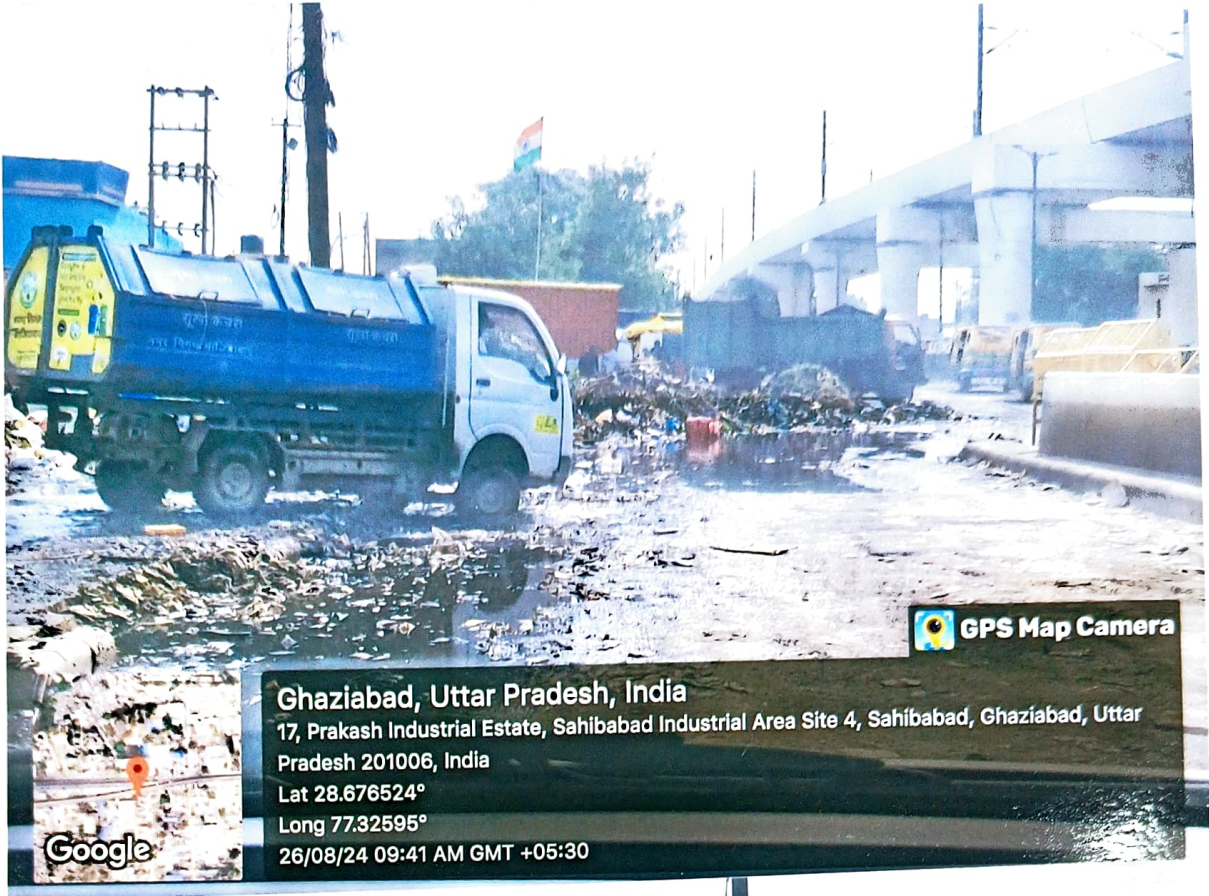
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Google





 **GPS Map Camera**



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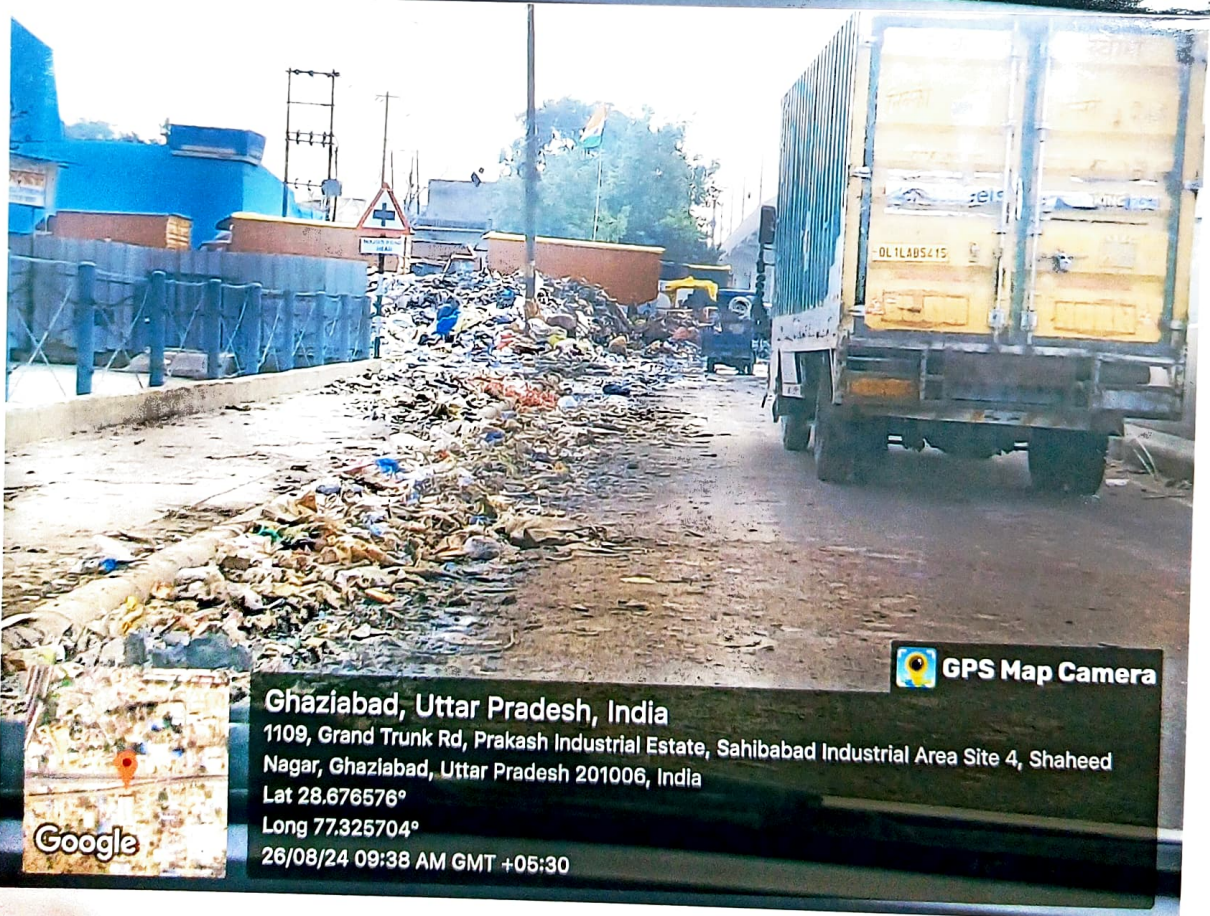
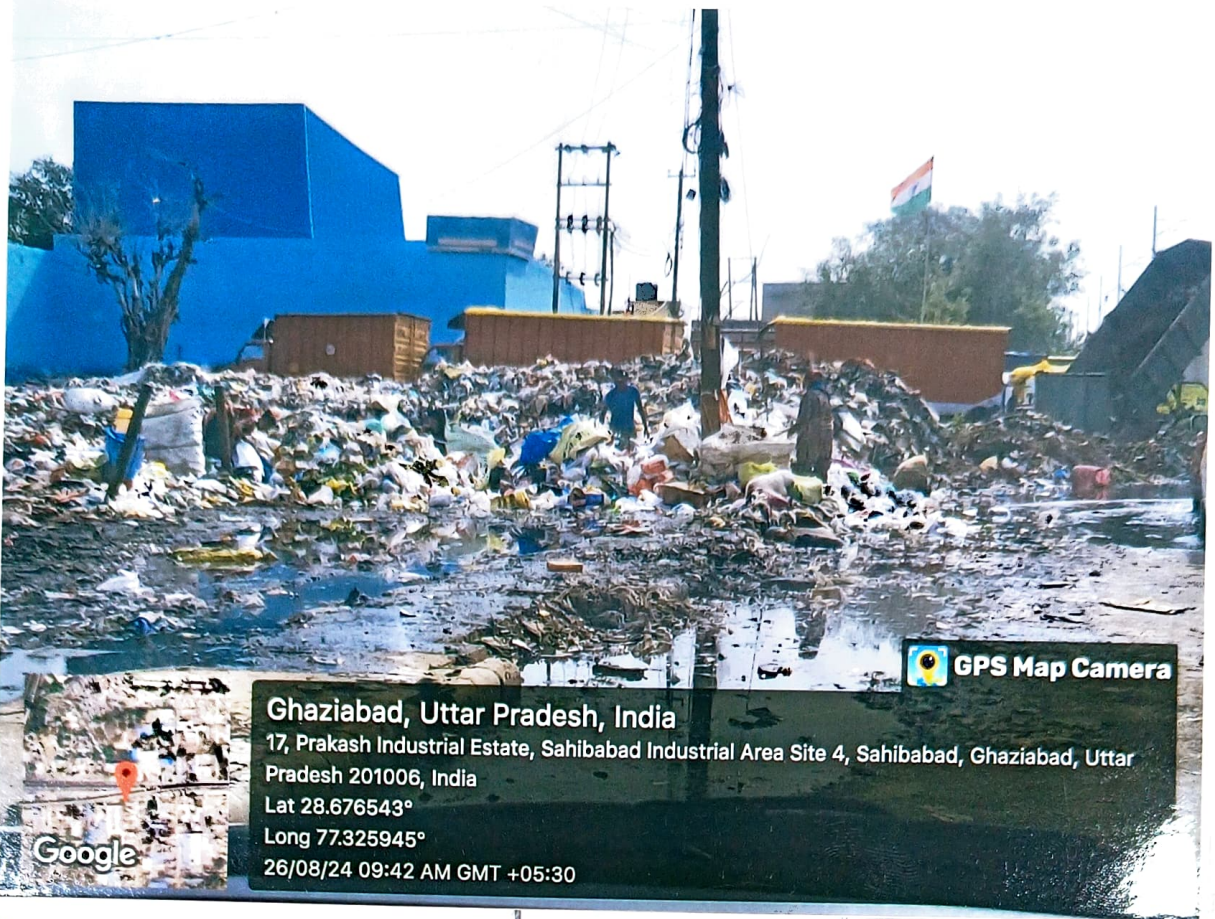
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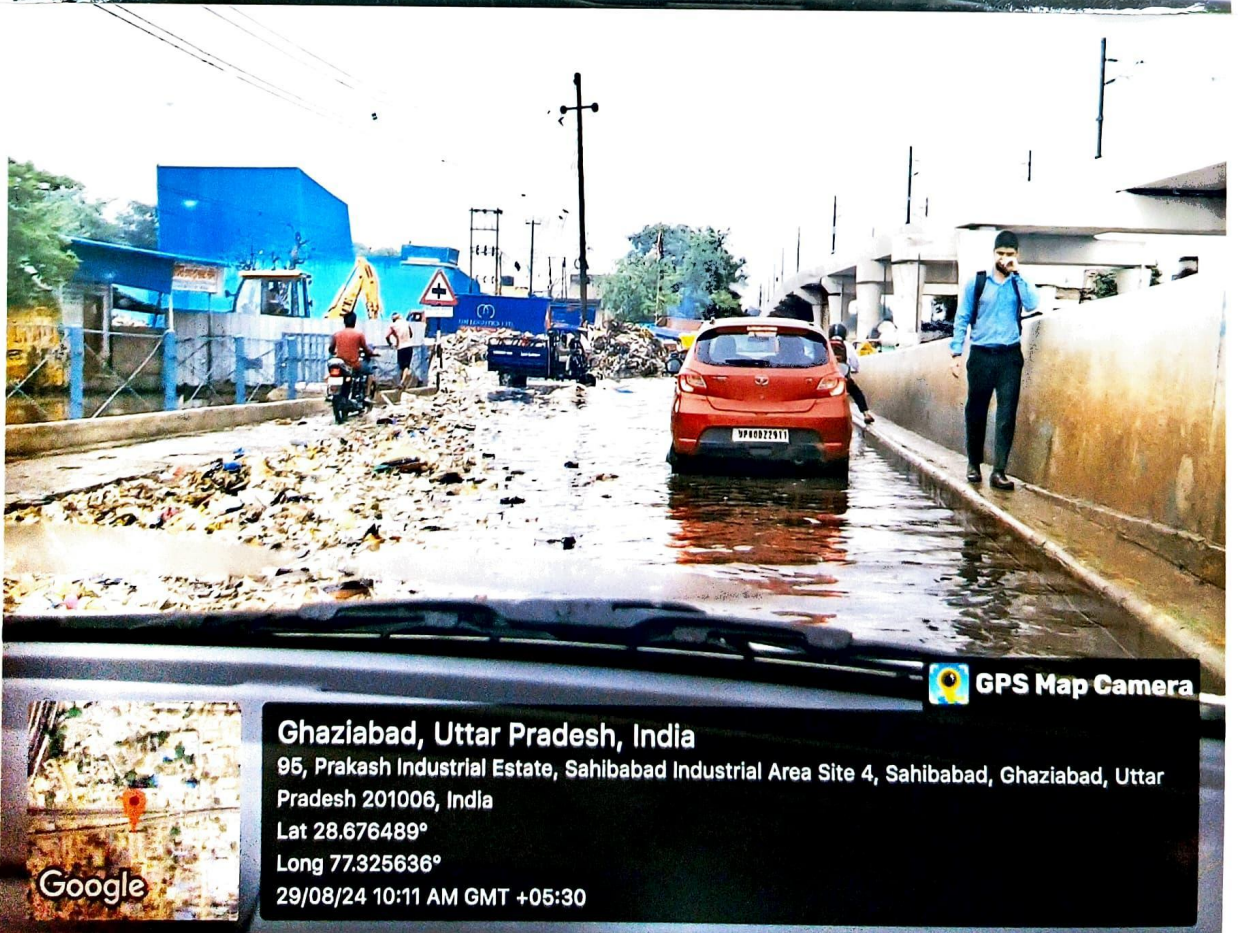
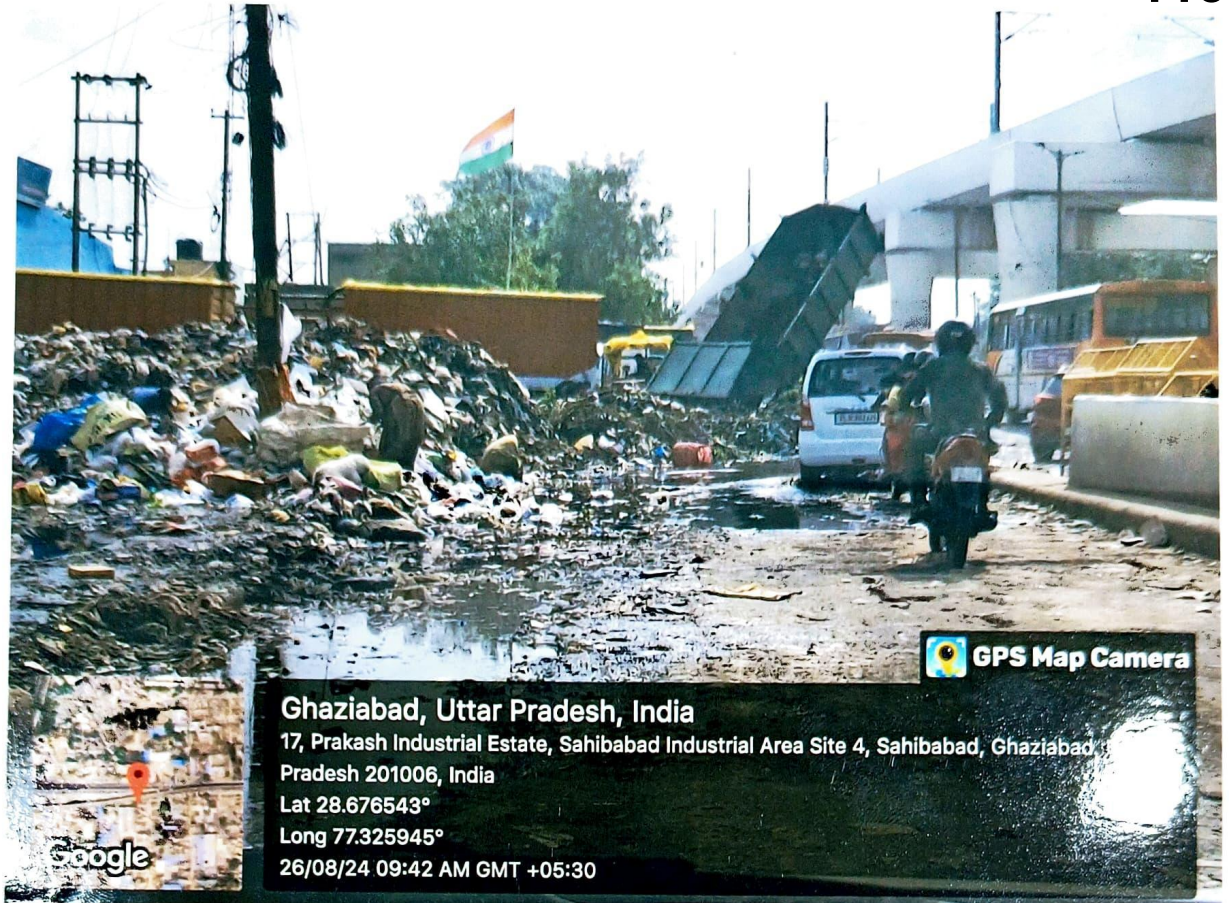
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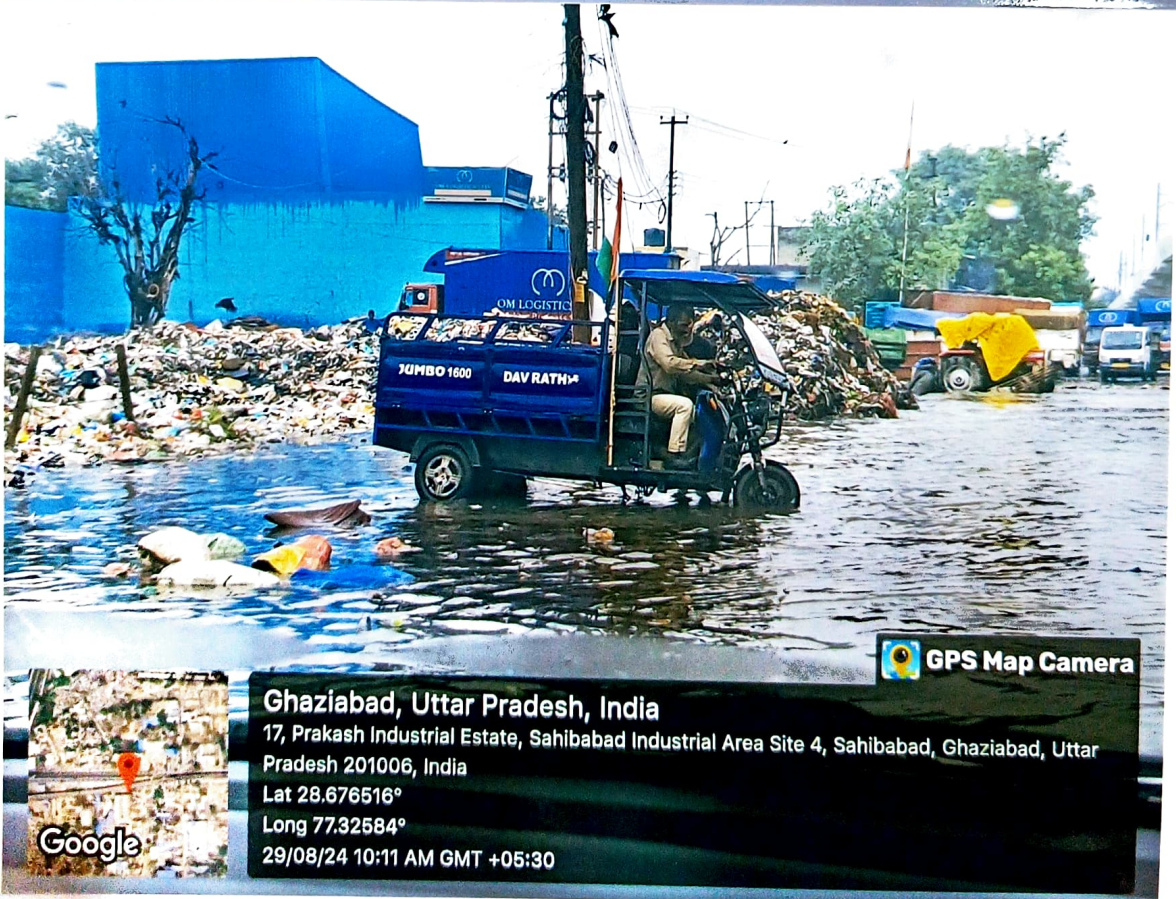
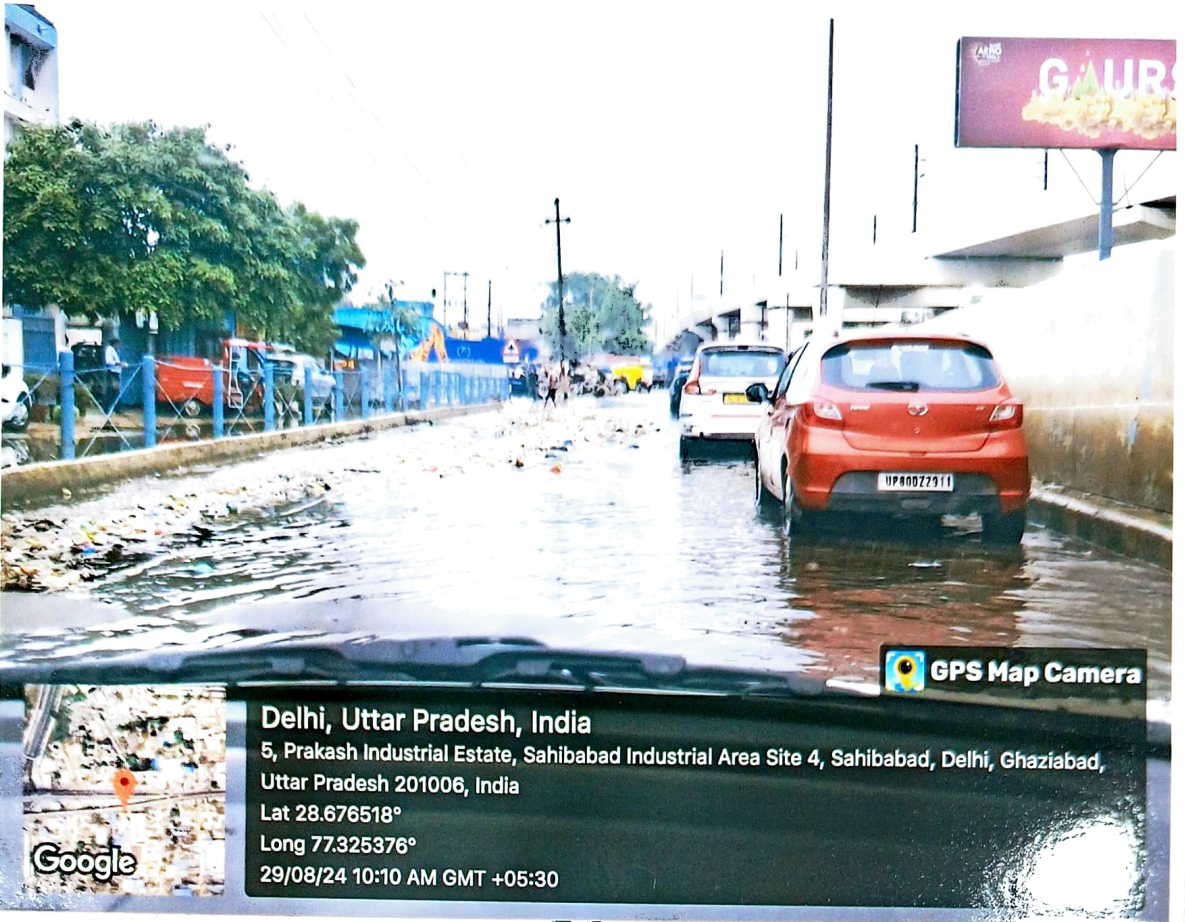
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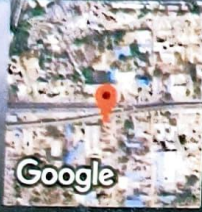


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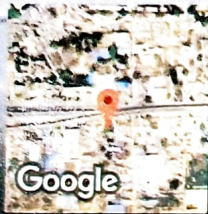
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 **GPS Map Camera**



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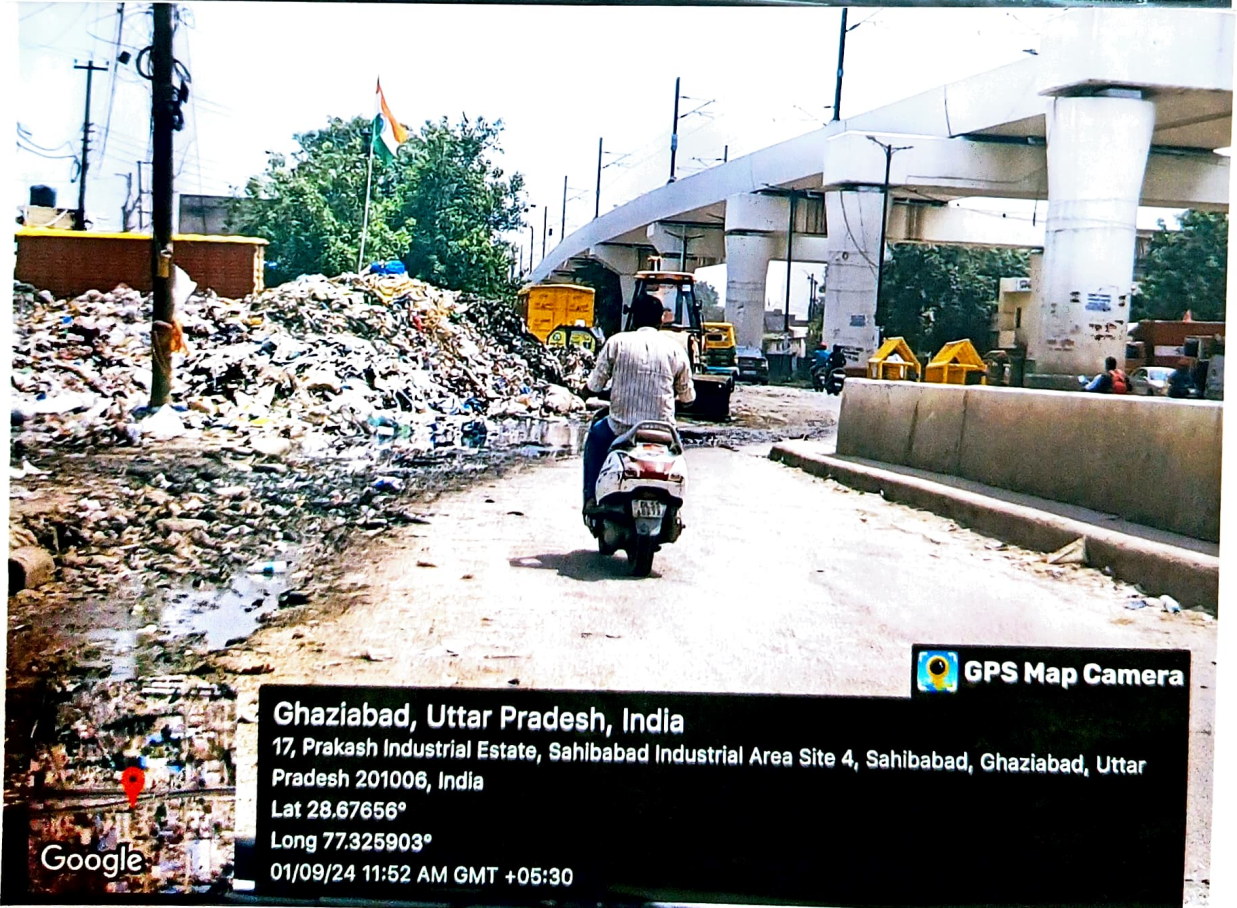
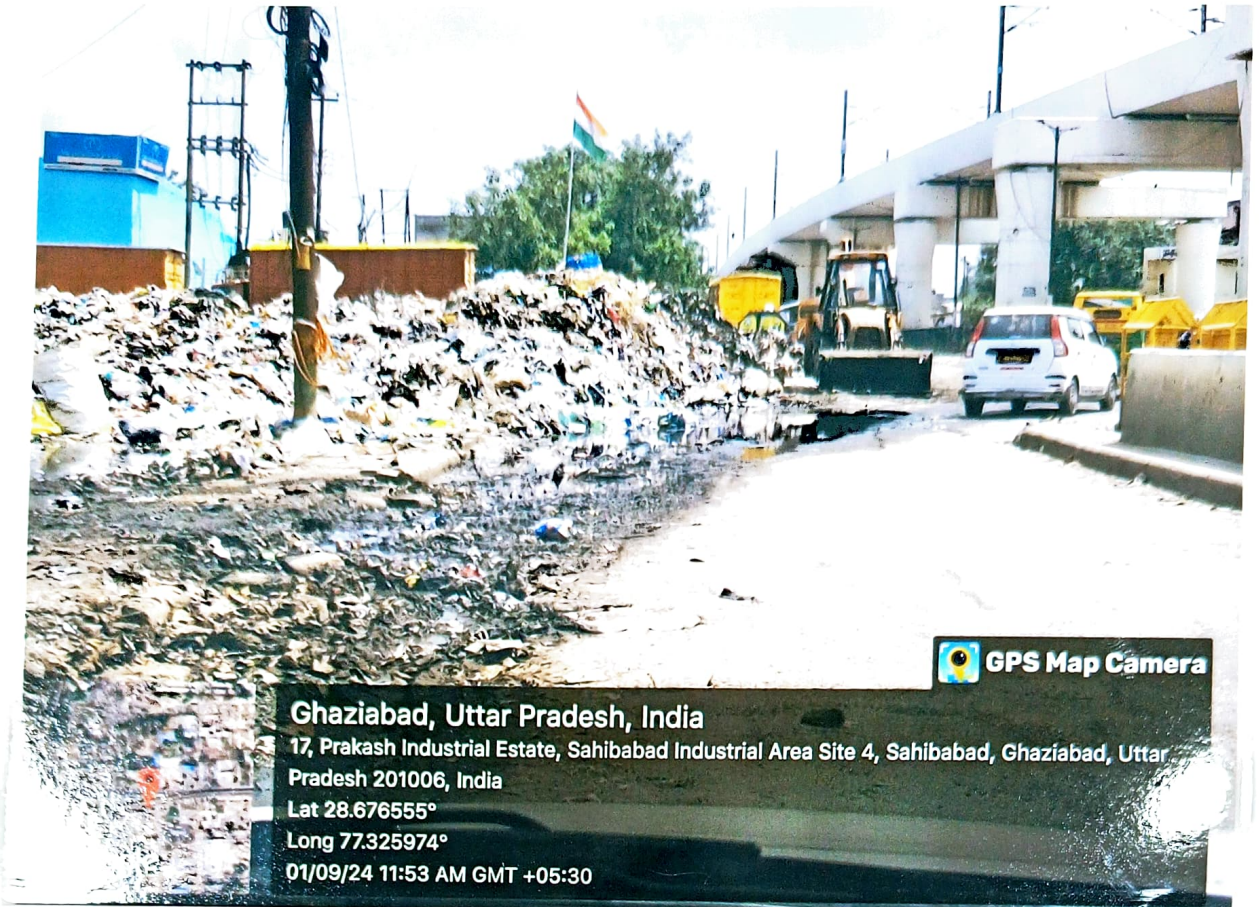
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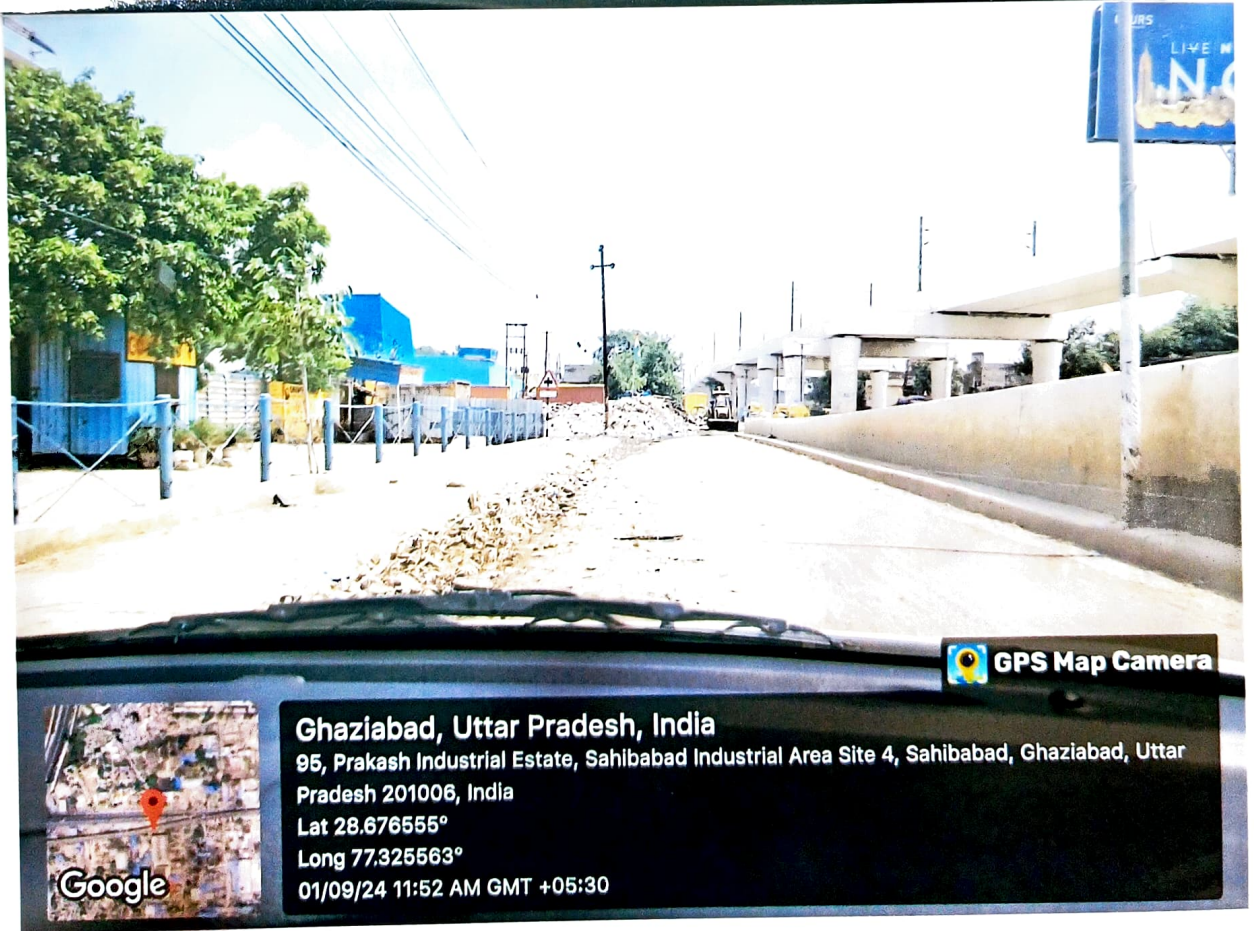


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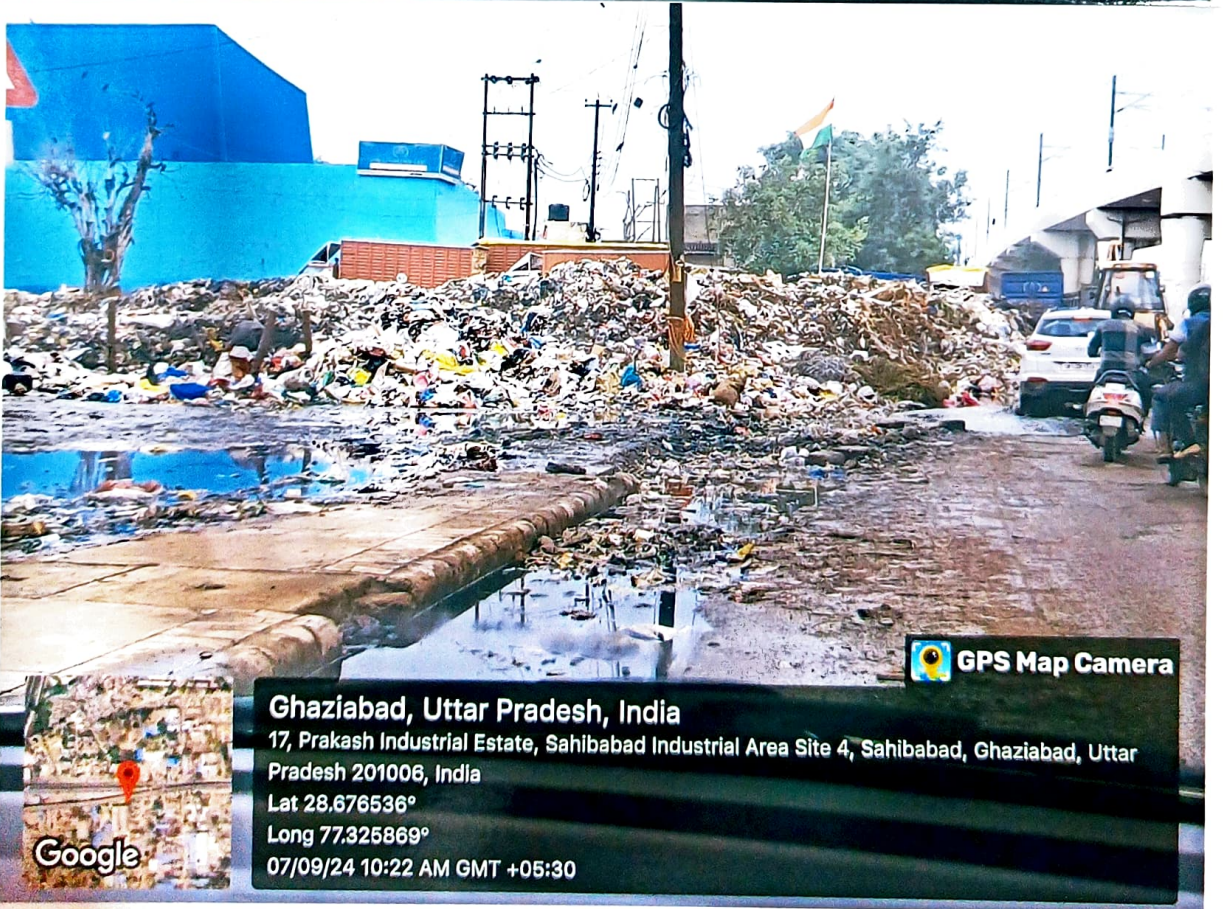


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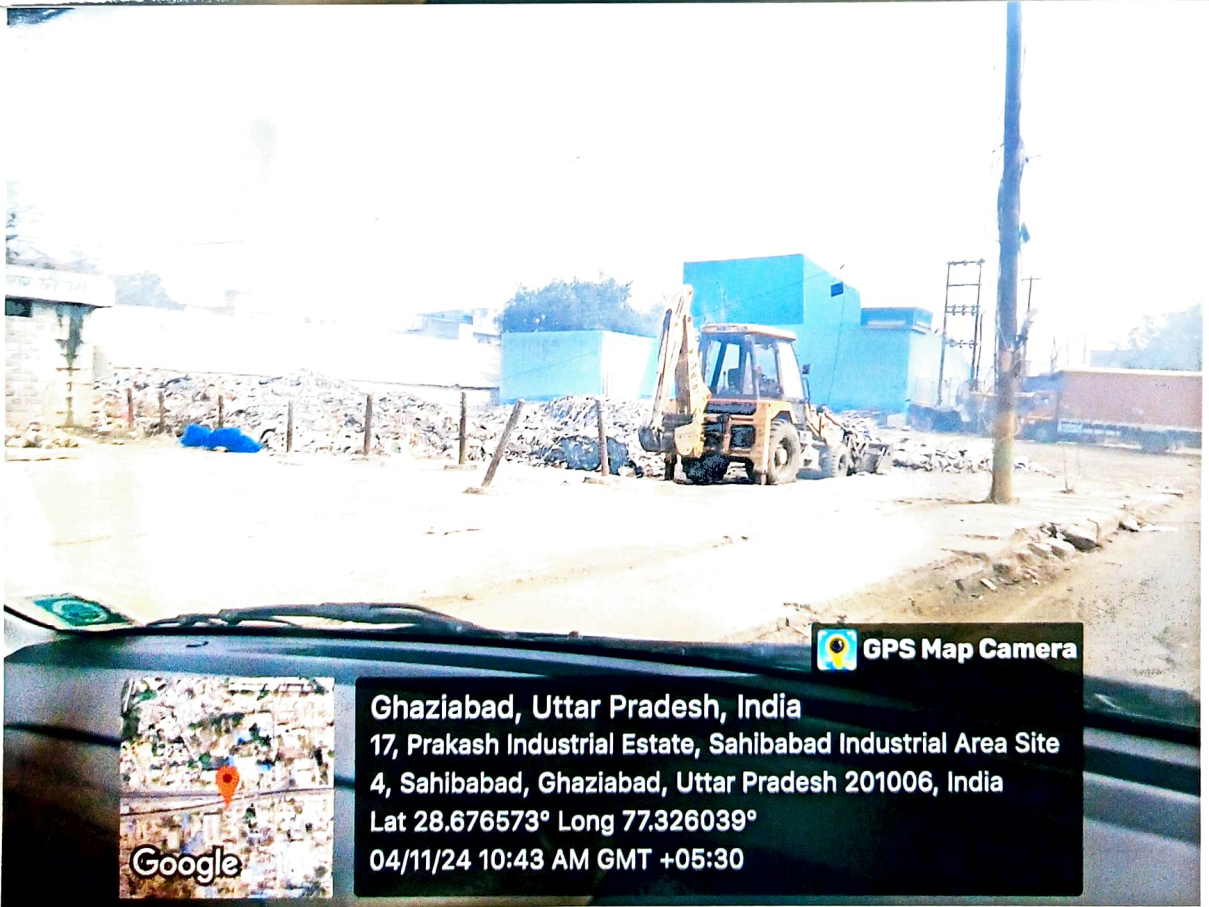


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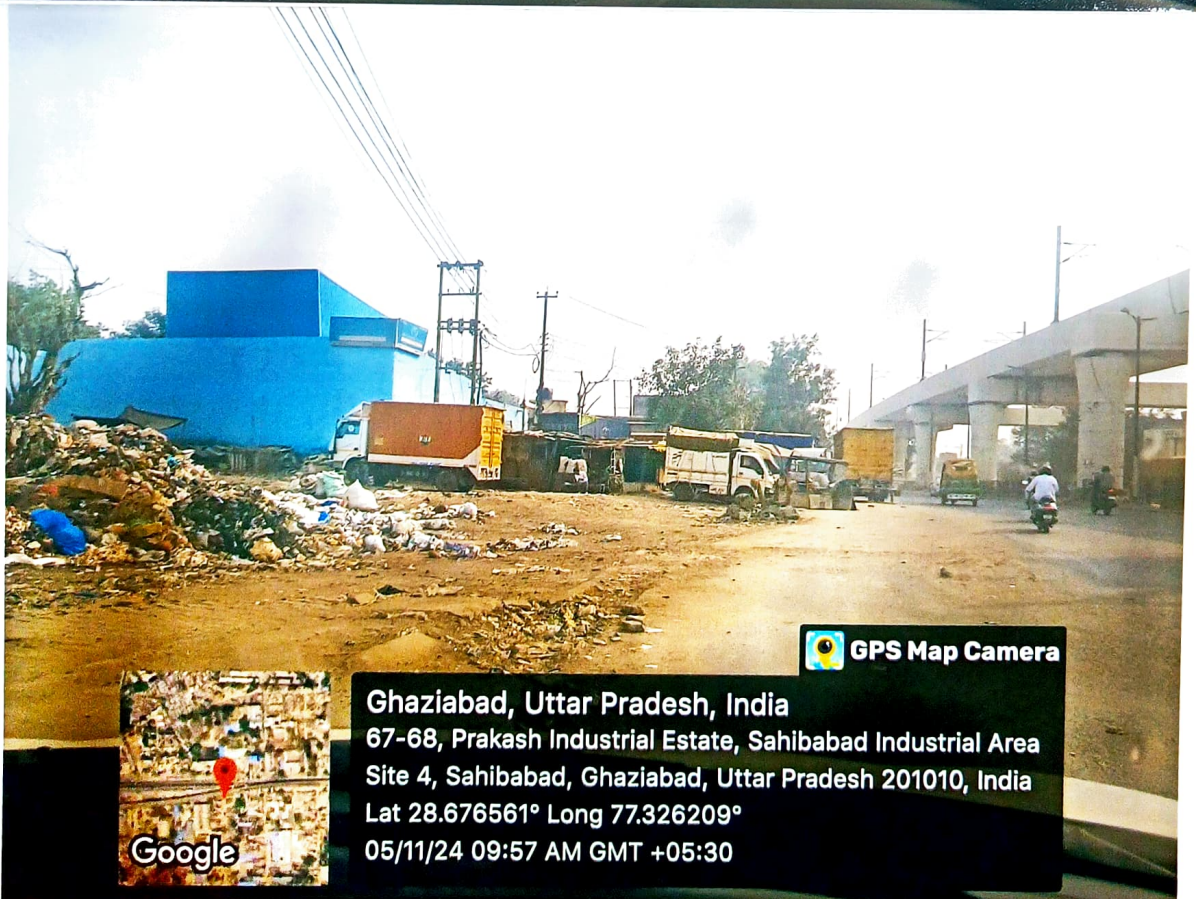




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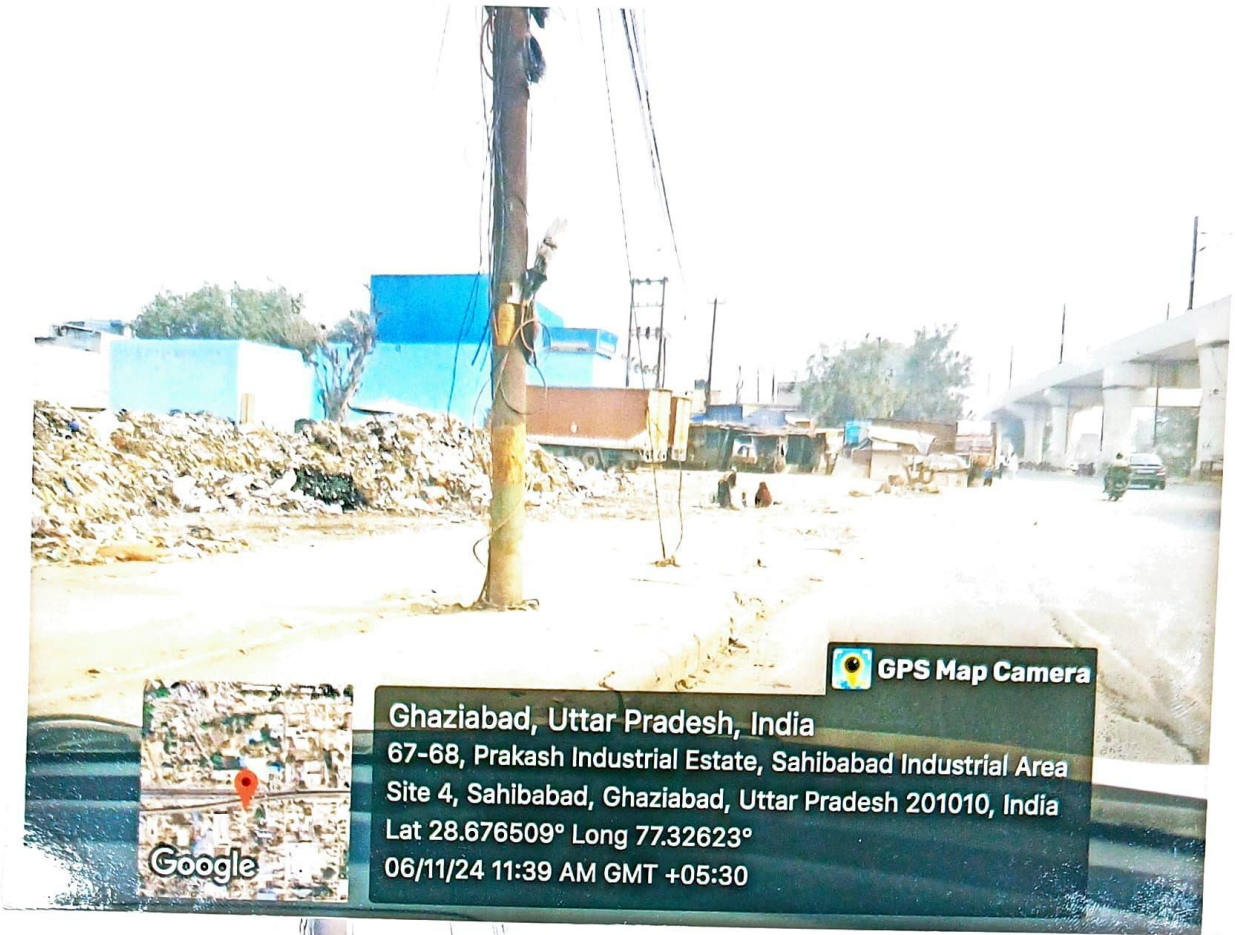
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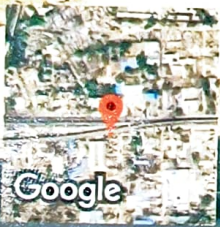
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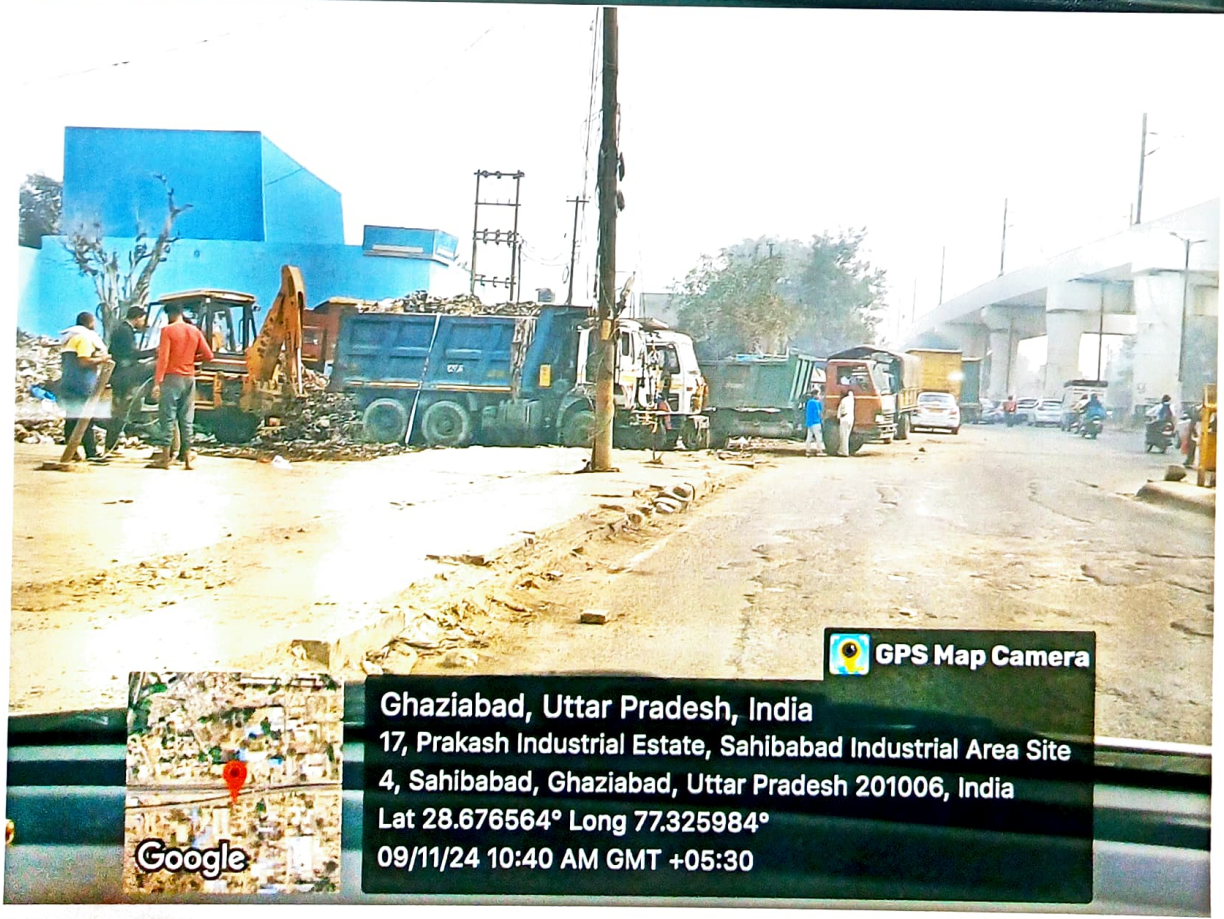






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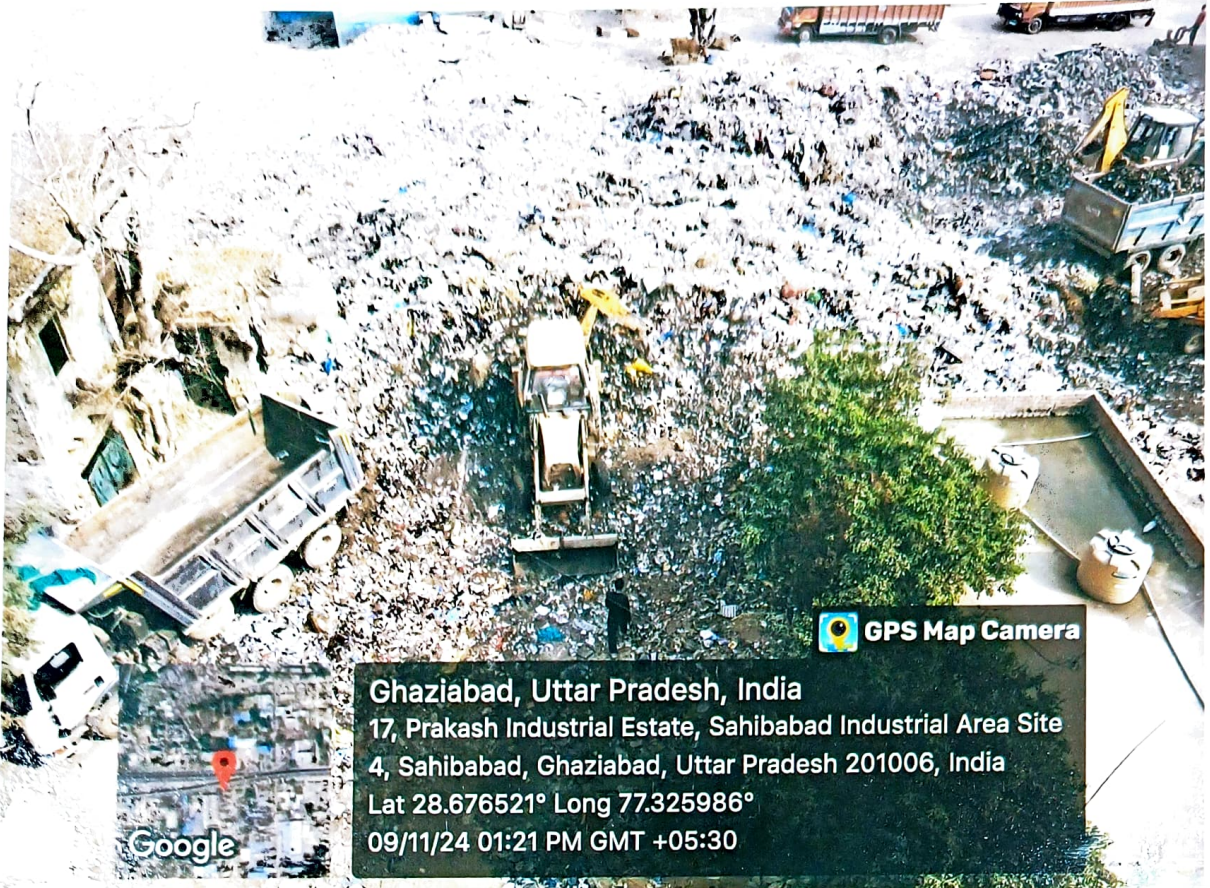
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Lat 28.676563° Long 77.325984°
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Ghaziabad, Uttar Pradesh, India
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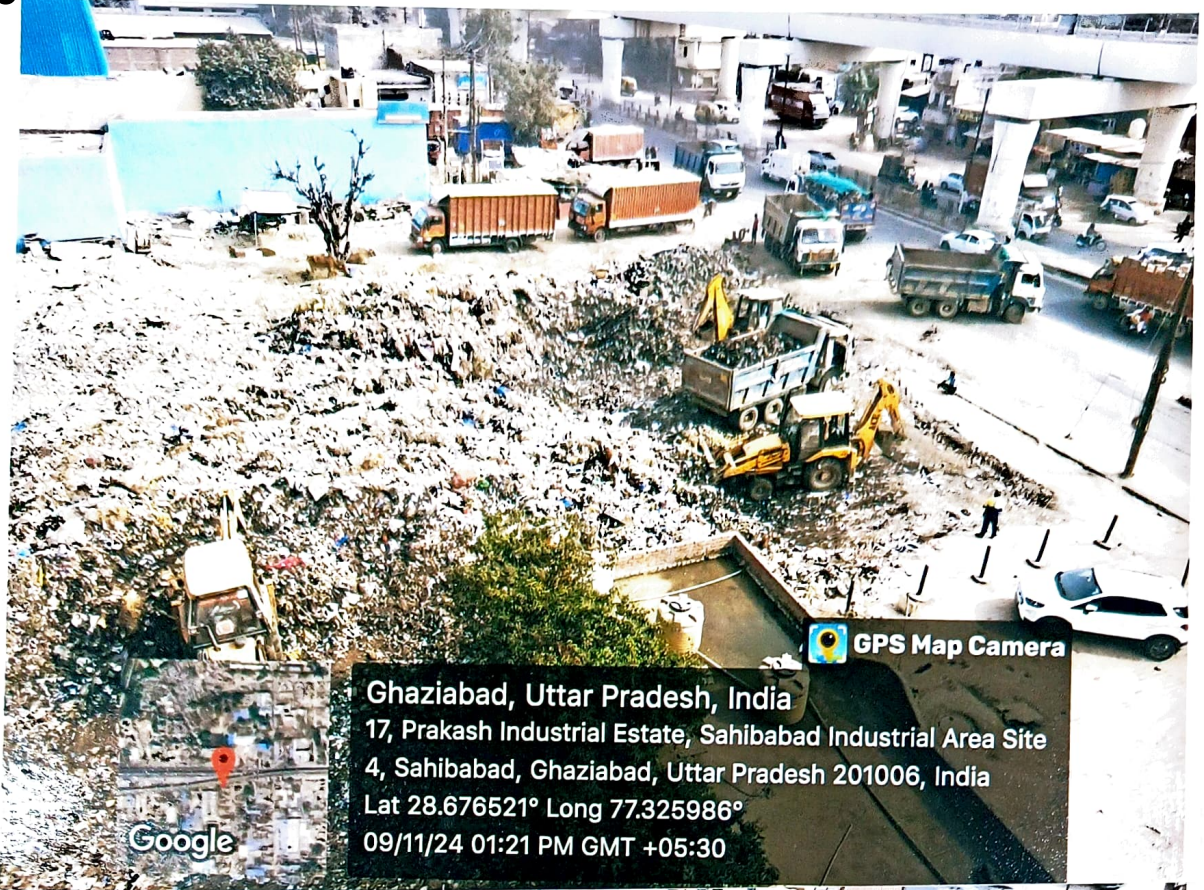
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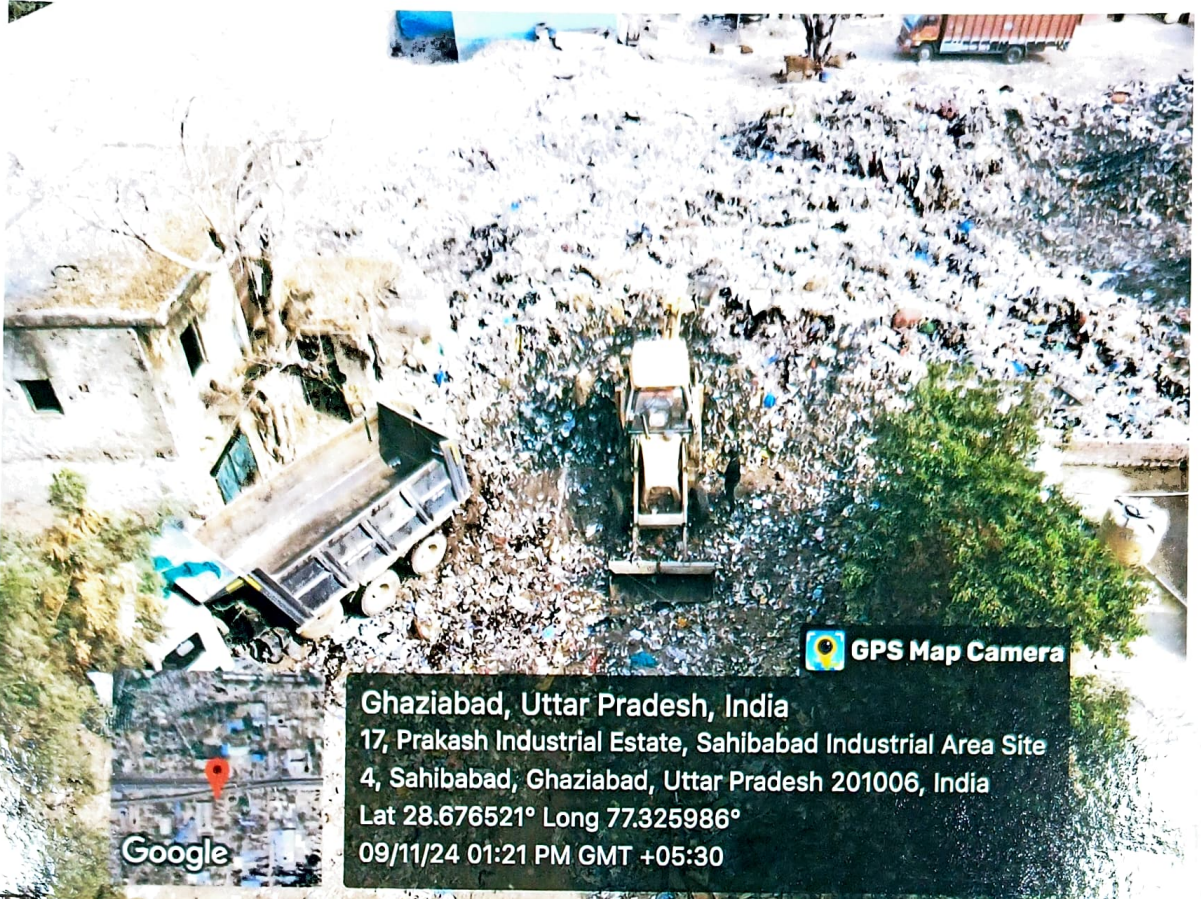
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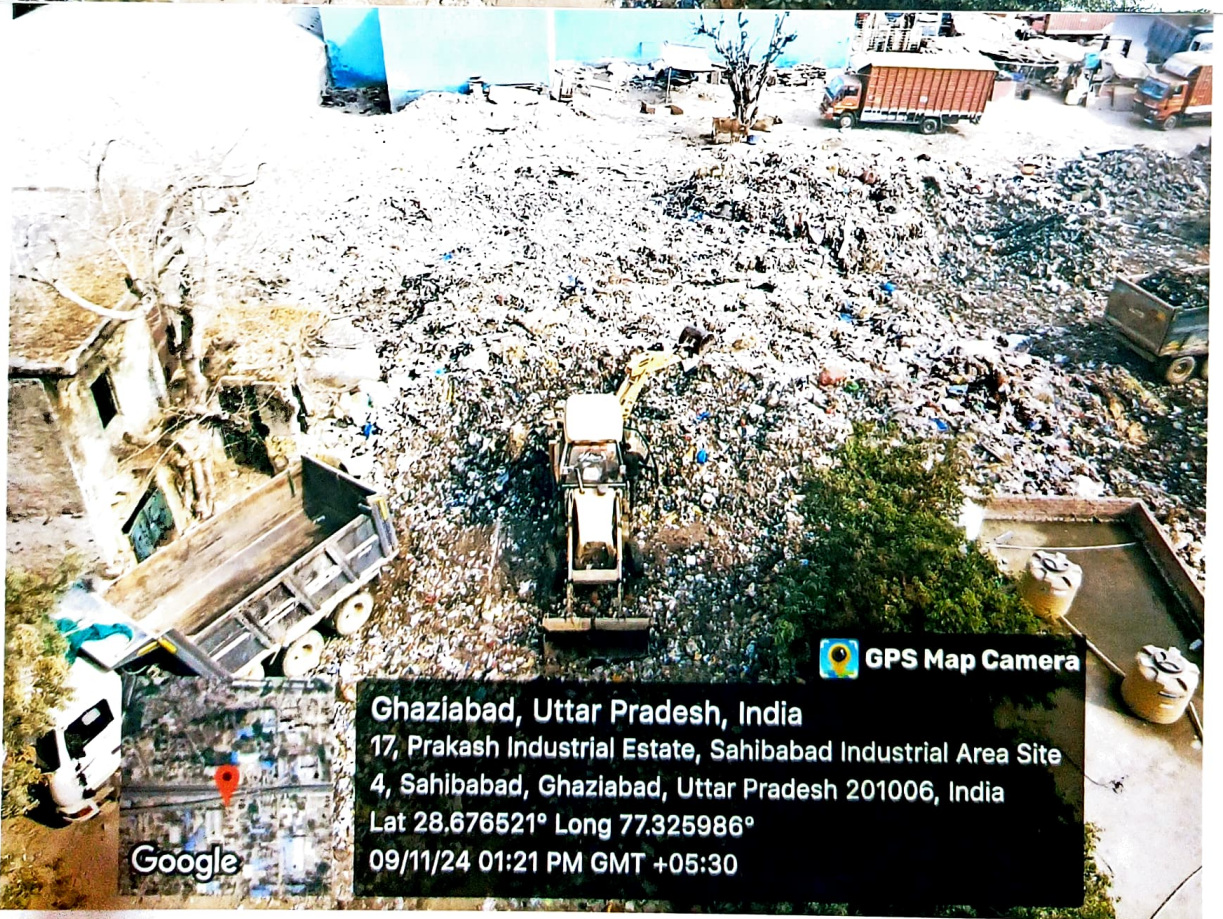




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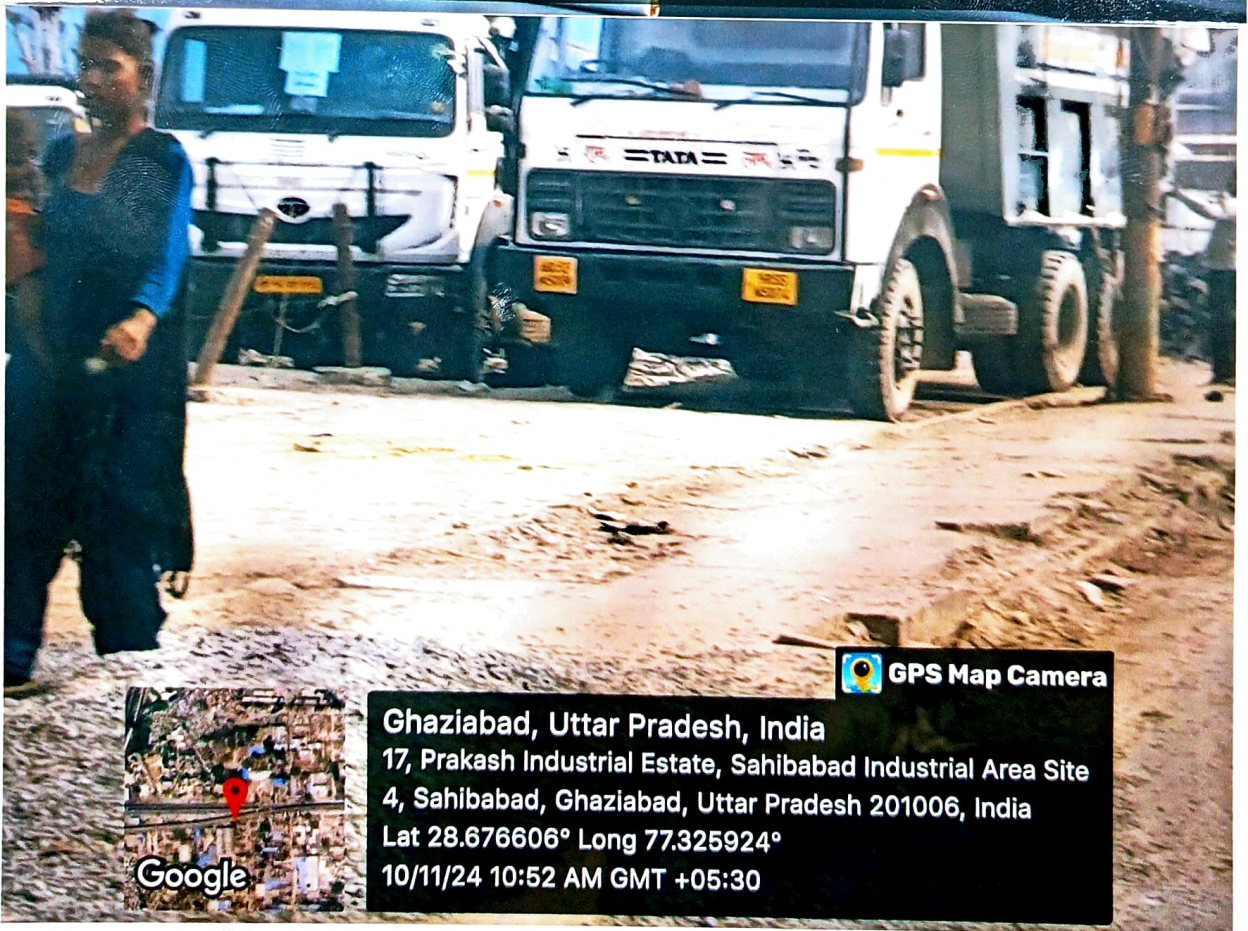
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