

**BEFORE THE NATIONAL GREEN TRIBUNAL, WESTERN  
ZONE**

**BENCH, PUNE AT PUNE**

**IN**

**APPEAL N6-O. 428/2025**

**IN THE MATTER OF:-**

DIPIN SHRIDHAR MORZO

.... APPELLANT

*Versus*

GOA COASTAL ZONE MANAGEMENT

AUTHORITY & ANR.

....RESPONDENTS

**INDEX**

<b><u>SL. NO.</u></b>	<b><u>PARTICULARS</u></b>	<b><u>PAGE NO.</u></b>
1.	Additional Affidavit on behalf of Respondent No. 5	1-6
2.	<b><u>Exhibit R-7</u></b> The copy of communication of impugned order dt 20/02/2025 through Registered AD obtained through RTI.	7-13
3.	<b><u>Exhibit R-8</u></b> The copy of the correction of the name of the Appellant vide dated 14/07/2022, along with GCZMA response vide dated 09/08/2022.	14-17
4.	<b><u>Exhibit R-9</u></b>	

461

	The copy of representation vide dated 02/12/2025	18-20
--	---	-------

FILED THROUGH



**(ANKUR KUMAR & ASSOCIATES)**

Counsels for the Respondent No. 5

2<sup>nd</sup> Floor, Alankar Apartment,

St. Mary Colony, Miramar, Goa -403001

Mobile No. 9384503190

Email:-ankurtnls.18@gmail.com

PLACE: Pune

DATE: 5/3/2026

2-1

21-F

FI-111

**BEFORE THE NATIONAL GREEN TRIBUNAL, WESTERN  
ZONE**

**BENCH, PUNE AT PUNE**

**IN**

**APPEAL NO. 428/2025**



**IN THE MATTER OF:-**

DIPIN SHRIDHAR MORZO

.... APPELLANT

*Versus*

GOA COASTAL ZONE MANAGEMENT

AUTHORITY & ANR.

....RESPONDENTS

**ADDITIONAL AFFIDAVIT TO BRING ON RECORD DOCUMENTS  
ON BEHALF OF RESPONDENT NO. 5, NAMELY MR. ANIL  
PRABHAKAR NAIK FILED BY THE APPELLANT IN APPEAL NO.  
428/2025.**

**MOST RESPECTFULLY SHEWETH:-**

I, Shri. Anil Prabhakar Naik, S/o late Prabhakar Shambhoo Naik,  
R/o - 64/F, Parel Village, Parel, Mumbai -400012, do hereby  
solemnly affirm and state on oath as under:-

1. That I am the Respondent No. 5 and such I am well  
conversant with the facts and circumstances of the case and

in that capacity I am duly competent to swear to the present affidavit.

2. That for proper adjudication of the Appeal and in the interest of Justice, the Respondent No.5 is placing on record the following documents.
3. That the Appellant is Para 10 and Para 12 of the Appeal made categorical statement on Affidavit that the impugned order passed by the Respondent No. 1 was never communicated to the Appellant, whereas the on 20/02/2025, the impugned order was communicated through Registered AD. The copy of communication of impugned order dt 20/02/2025 through Registered AD obtained through RTI is annexed and marked as **EXHIBIT R-7**.
4. That the Respondent No. 5 filed the original complaint vide dated 25/04/2022 before the GCZMA (Respondent No.1 herein) in the name of Mr. Vishal alias Dipin Shriodhkar Morje, which was further corrected by the representation made vide dated 14/07/2022 as Mr. Vishal alias Dipin Shridhar Morje before GCZMA, to which the Respondent No. 1, vide dated 09/08/2022, vide Ref No. GCZMA/N/ILLE-



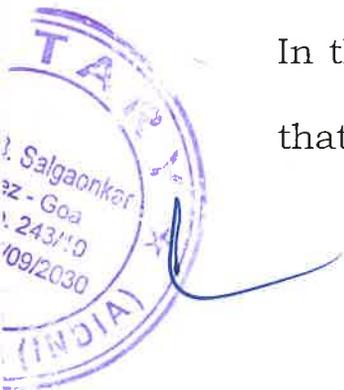
COMP/22-23/35/973, taking note of the correction of the name of the violator as Mr. Vishal alias Dipin Shrirodkar Morje instead of Shridhar Morje, send representation of the Chairman, District Level Committee, office of the collector (North), Collectorate building, Panaji, Goa. The copy of the correction of the name of the Appellant vide dated 14/07/2022, along with GCZMA response vide dated 09/08/2022, is annexed and marked as **EXHIBIT R-8.**

5. That on 2/12/2025, the Respondent No. 5 made representation before the Respondent No. 1, GCZMA about the correction in the name of the Appellant herein despite the Respondent No.1 failed to reply to the representation of the Respondent No. 5 till date. The copy of representation vide dated 02/12/2025 is annexed and marked as **EXHIBIT R-9.**

6. The present Additional Affidavit is made with Bonafide intention and in the interest of justice.

PRAYER

In the facts and circumstances, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:



- a. Allow the present Additional Affidavit for placing on record additional documents from Exhibit R-7 to Exhibit R-9.
- b. Pass such other order(s) as this Hon'ble Court may deem fit.

**AND FOR THIS ACT OF KINDNESS THE APPLICANT AS  
IN DUTY BOUND SHALL EVER PRAY.**

Place:- *Panvorim, Goa*

Date:- *5/3/2026*



Adv. For Respondent No. 5.



**BEFORE THE NATIONAL GREEN TRIBUNAL, WESTERN  
ZONE**

**BENCH, PUNE AT PUNE**

**IN**

**APPEAL N6-O. 428/2025**

**IN THE MATTER OF:-**

DIPIN SHRIDHAR MORZO

.... APPELLANT

*Versus*

GOA COASTAL ZONE MANAGEMENT

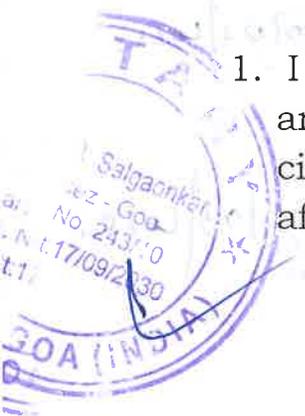
AUTHORITY & ANR.

....RESPONDENTS

**AFFIDAVIT**

I, Shri. Anil Prabhakar Naik, Aged -73 years, S/o late Prabhakar Shambhoo Naik, R/o - 64/F, Parel Village, Parel, Mumbai -400012, do hereby solemnly affirm and state on oath as under:-

1. I state that I am the Respondent No.5 in the present Appeal, and being fully conversant with the records, facts, and circumstances of the case, we are competent to swear this affidavit.



- 2. That the contents of the accompanying Affidavit are true to my knowledge have been explained to me and I have understood the same and state that the averments made therein are true and correct to the best of my knowledge and belief.
- 3. That the Annexures filed herewith are true copies of their respective originals.

*Upmaik*

DEPENDENTS

Solemnly Affirmed & Verified at Porvorim, Goa, on this day *5th* of *March* 2026

*Ankur Kumar*

Identified by

Adv Ankur Kumar

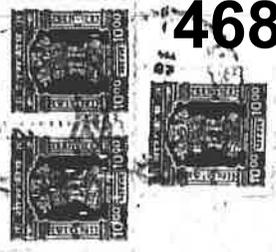


SOLEMNLY AFFIRMED AND VERIFIED BEFORE/ME BY *Anil Prabhakar Nark*  
 WHO IS IDENTIFIED BEFORE/ME BY *Adv. Ankur Kumar*  
 WHOM I KNOW  
 SERIAL NO. *831/wr* DATED *05/03/2026*

*Shilpa B. Salgaonkar*  
 SHILPA B. SALGAONKAR  
 NOTARY AT BARDEZ - GOA  
 STATE OF GOA-INDIA  
 REG. NO. 243/10

Regd. No. / **D. I. B. S.** /  
No. 10 (1000 000000 0000)

No. GICZMA/JN/RUE-GmpL-122-23/35 / Part IV / 3732



468

To: ~~Mr. Shurdhat Morje,~~  
~~Mr. P. Sacho Khazan,~~  
~~Mayim, Pochem - Goa~~  
Post Office  
Refer to  
No. 403512

O/o Member Secretary  
Goa Coastal Zone Management Authority  
C/o Department of Environment & Climate Change  
Deraspo Tower 4th Floor  
Patto Plaza Panjim Goa - 403001



107



7

Exhibit 7

80

469



To, **Minister Secretary**  
GPA Coastal Zone

Department of Environment & Forest Usage  
Patio Plaza Panjim Goa, India

Postage meter grid



RM 52685572 5IN

Postage stamp of office of posting  
Postage meter number 52685572



From: Hub  
Front Hub  
Net: 0.00, Net Fee: 0.00, Net Fee: 0.00  
Rct Fee: 0.00, Rct Fee: 0.00, Rct Fee: 0.00  
Counter No: 1, Rct Fee: 0.00, Rct Fee: 0.00  
Rct Fee: 0.00, Rct Fee: 0.00, Rct Fee: 0.00  
Rct Fee: 0.00, Rct Fee: 0.00, Rct Fee: 0.00



# 470

## GOA COASTAL ZONE MANAGEMENT AUTHORITY

C/o Department of Science, Environment (Govt. of Goa)  
4<sup>th</sup> Floor, Dempo Towers, Patto, Panaji Goa  
www.czma.goa.gov.in

Ref.No. GCZMA/N/Ille-Compl/22-23/35/Part IV/572

Dated: 10/02/2025

**DIRECTIONS UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986, READ WITH RULE 4 OF THE ENVIRONMENT (PROTECTION) RULES, 1986.**

**WHEREAS**, the Goa Coastal Zone Management Authority (hereinafter referred to as 'the GCZMA' in short) has been constituted by the Ministry of Environment & Forests (MoEF), Government of India pursuant to the directions of the Hon'ble Supreme Court of India to deal, inter alia, with violation of the Coastal Regulation Zone (CRZ) Notification 2011 and implementation of the CRZ Notification.

**AND WHEREAS**, a complaint letter from Mr Anil Prabhakar Naik on the 25/04/2022 wherein the Petitioner has complained regarding the illegal construction carried out by Mrs Lourdin D'Silva, Mr Kundan Shashikant Morje, Mr Vishal alias Dipin Shirodkar Morje, Mr Trivikram Jaidev Morje and Mr Shamsundar Ramnath Bhosle alias Vagalkar, Dilip Manguesh Morje and one Mrs D'Souza and her family members all resident of Tembwada Morjim Pernem Goa; for carrying out illegal and unlawful constructions in CRZ area in the property bearing Sy No 119/3 of Morjim Village

**AND WHEREAS**, the Engineers and Field surveyor attached to this office did the site inspection. During site inspection the inspecting team noted the violations carried out (Enclosed copy of the Site Inspection Report)

**AND WHEREAS**, upon close perusal of the said complaint letter and the Site Inspection report the following alleged illegal construction resulting violation of CRZ Notification 2011 is noticed:

Sr. no.	Name of the structure	Sy No.	Type/Nature of the structure	Owner/ Occupants name	Description
1	Z4	119/3 Morjim	Ground floor Residential /Permanent	Shridhar Morje	Ground floor structure covered with flat RCC roof slab having a permanent plinth.

**AND WHEREAS**, the Respondent was issued a Show Cause Notice and directed to file reply and remain present for a personal hearing on the 05/11/2024 at 3.30p.m.

**AND WHEREAS**, the Respondent filed his reply along with documents.

Received  
[Signature]

AND WHEREAS, the matter was placed in the 418<sup>th</sup> GCZMA Meeting held on 05/11/2024 the Proceeding at the hearing, "*Respondent present and sought for time.*"

AND WHEREAS, the matter was placed in the 418<sup>th</sup> GCZMA Meeting held on 05/11/2024 the decision at the hearing, "*The Authority directed the Respondent to file his reply by the 06/11/2024 and posted the matter on 12/11/2024 at 3.30p.m for orders.*"

AND WHEREAS, the matter was placed in the 419<sup>th</sup> GCZMA Meeting held on 12/11/2024 the Proceeding at the hearing, "*Complainant present and stated that he has no objection in granting the Respondent time. He insisted that a Copy of the Replies filed by the Respondent be furnished to him. The Respondent sought time to file detailed reply.*"

AND WHEREAS, the matter was placed in the 419<sup>th</sup> GCZMA Meeting held on 12/11/2024 the decision at the hearing, "*The Authority granted time and directed the Respondents to file reply by 13/11/2024 by 1.00p.m and remain present for Arguments on 14/11/2024 at 3.30p.m.*"

AND WHEREAS, the matter was placed in the 420<sup>th</sup> GCZMA Meeting held on 14/11/2024 the Proceeding at the hearing, "*Adv for the Complainant present along with Complainant. Respondents present and filed reply. Adv for the Complainant sought for time to file rejoinder. The Complainant on the last date of hearing was categorically informed that he should collect the reply submitted by the Respondent on 13/11/2024 at 3.00p.m and the Respondent were also directed to file replies if any by 01.00p.m on 13/11/2024. However, it has been informed to the Authority that the Complainant did not collect all the replies on the 13/11/2024 after 3pm. The Complainant today i.e on 14/11/2024 submits that some of the replies filed by various respondents have been collected today i.e 14/11/2024 and that he seeks time of a period of one week to file rejoinder to the replies of the Respondent. Simultaneously the Advocate Amonkar appearing for some of the Respondents have stated that some of the structures are falling outside the CRZ area. The DSLR officials have been carrying out demarcation of the structures at the place because the structures which are a subject matter of this litigation are partly located within CRZ III and partly outside. The mapping of the structure are also essential to ascertain as to which are the alleged offending structure which are located outside the CRZ area.*"

\* AND WHEREAS, the matter was placed in the 420<sup>th</sup> GCZMA Meeting held on 14/11/2024 the decision at the hearing, "*The Authority also directed the DSLR to map the structures falling outside the CRZ area. The Authority decided to grant time to the Complainant to file reply by 21/11/2024 at 3.30p.m with a copy to be given to the Respondent and posted the matter for arguments on 26/11/2024 at 3.30p.m*"

AND WHEREAS, the matter was placed in the 421<sup>st</sup> GCZMA Meeting held on 21/11/2024 the Proceeding at the hearing, "*Adv for Complainant present along with Complainant. Respondent expired hence his son Mr Dipin Shridhar Morje is present before the Authority. Adv for the Complainant files rejoinder. Copy of the Rejoinder furnished to the Respondent. Adv states that he wants to file sur rejoinder by 25/11/2024. The Complainant consent.*"

AND WHEREAS, the matter was placed in the 421<sup>st</sup> GCZMA Meeting held on 21/11/2024 the decision at the hearing, "*The Authority posted the matter for final arguments on the 26/11/2024 at 3.30p.m*"

AND WHEREAS, the matter was placed in the 422<sup>nd</sup> GCZMA Meeting held on 26/11/2024 the Proceeding at the hearing, "Adv for the Complainant present along with the Complainant. Adv Amey Kakodkar for the Respondent present and relied on the reply and documents filed by him on behalf of the Respondent."

AND WHEREAS, the matter was placed in the 422<sup>nd</sup> GCZMA Meeting held on 26/11/2024 the decision at the hearing, "The Authority heard the arguments and posoted the matter for clarification/ arguments/ orders on 10/12/2024 at 3.30p.m"

AND WHEREAS, the matter was placed in the 424<sup>th</sup> GCZMA Meeting held on 10/12/2024, the Proceeding at the hearing, "Adv for Complainant present along with Complainant. Adv for Respondent present and sought for time ."

AND WHEREAS, the matter was placed in the 424<sup>th</sup> GCZMA Meeting held on 10/12/2024 the decision at the hearing, "The Authority granted time and posted the matter on 12/12/2024 at 3.30p.m. "

AND WHEREAS, the matter was placed in the 425<sup>th</sup> GCZMA Meeting held on 12/12/2024, the Proceeding at the hearing, "Adv for Complainant along with Complainant present. Adv for Respondent present. The Respondent in response submitted that he is hailing from traditional fisherfolk community and that his structure is located outside the CRZ as per CZMP 2011. He stated that the structure is an aged old ancestral house and that he would take reasonable time to collate the documents to be submitted before the Authority. He went on to submit that the name of his ancestor is recorded in the form I & XIV and that the said house is a Mundkarial house. To demonstrated the fact that the house is prior to 1991 he placed on record a certificate issued by the Village Panchayat of Morjim which states that the house tax has been assessed in the name of the applicant since the year 2000 onwards. He also placed the community certificate to demonstrate the fact that he hails from the fisherfolk community finally he has placed an electricity bill in respect of the energisation dated which is of 2/10/1999. He hence prayed that the SCN be withdrawn and proceeding be dropped. ."

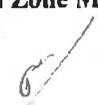
AND WHEREAS, the matter was placed in the 425<sup>th</sup> GCZMA Meeting held on 12/12/2024 the decision at the hearing, "The Authority after going through the defence taken by the Respondent is of the opinion that no substantial documents are produced by him to say that the structure in question was an authorised construction and in existence prior to 1991. Secondly, it is evident that the said structure was constructed post 1991 and hence the energization date is 02/10/1999 post which the local body has begun to assess the house from the year 2000 onwards. We are also of the opinion that the need to carryout mapping of the structure is sine-qua-non to decide the proceeding because all what this authority wanted to determine is as to whether the entire property is located in CRZ area is located in CRZ area or only part of it and to that effect majority of the area is located in

*the CRZ area and only a small portion is outside CRZ area and for that matter the structure of the Respondent is not located in the area which is outside CRZ Limits. The Authority thus deemed it fit to direct the Respondent to demolish ”*

**NOW THEREFORE**, the GCZMA in exercise of the powers conferred under Section 5 of the Environment (Protection) Act, 1986 (Central Act 29 of 1986) read with sub-rule (3) (a) of Rule 4 of the Environment (Protection) Rules 1986, and read with power vested with the GCZMA vide Order S.O. 6071 (E) dated 27/12/2022 issued by the Ministry of Environment & Forests, Government of India, hereby directs **MR SHRIDHAR MORJE**, r/o Piracho Khazan, Morjim Pernem Goa, to **demolish Ground floor structure covered with flat RCC roof slab having a permanent plinth, standing in the property bearing Sy No. 119/3 of Morjim Village, Pernem, Goa** as decided in the 425<sup>th</sup> GCZMA meeting held on 12/12/2024 and further to restore the land to its original condition, within 30 days from the date of receipt of this order. The Dy. Collector & S.D.O, Pernem, Goa to verify if the said structures are demolished as per these directives failing which the concerned Deputy Collector/ S.D.O shall **demolish the Ground floor structure covered with flat RCC roof slab having a permanent plinth, standing in the property bearing Sy No. 119/3 of Morjim Village, Pernem, Goa** to enable restoration of land to its original state within 15 days and recover the expenses incurred from **MR SHRIDHAR MORJE**, r/o Piracho Khazan, Morjim Pernem Goa, as the arrears of land revenue. Further, Dy. Collector & S.D.O, Pernem, Goa is required to submit a compliance report in respect of above directions to the GCZMA within next 3 days of expiry of the aforementioned time period of 30 days.



**For and on behalf of the  
Goa Coastal Zone Management Authority**

  
(Shri Sachin Desai)

**Member Secretary (GCZMA)**

To,  
**MR SHRIDHAR MORJE**, r/o Piracho Khazan, Morjim Pernem Goa,

Copy to:

1. The Collector & District Magistrate (North), Office of the Collector (North), Collectorate Building, Panaji-Goa... for information and necessary action.
2. The Dy. Collector & SDO of Pernem, Pernem Goa..... who is required to enforce these directions in accordance with law.
3. The Secretary, Village Panchayat of Morjim -Goa.....who is required to enforce these directions and initiate action under Goa Panchayat Raj Act.
4. Anil Prabhakar Naik, r/o H.No. 64/F, Parel Village, Parel, Mumbai

474

13



Indian Union Driving Licence  
Issued by GOA



GA06 20100023784



Issue Date	Validity (NT)	Validity (TR)
20-04-2010	19-04-2030	03-09-2028

Holder's Signature

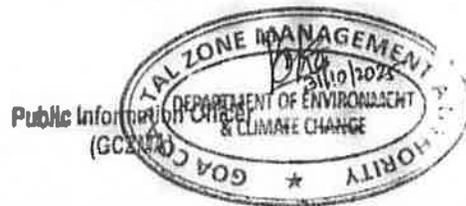
Name: **DARIN S MORZO**  
 Date of Birth: **18-08-1981** Blood Group: **-** Organ Donor: **Y**  
 Son/Daughter/Wife of: **SHIVDAR S MORZO**  
 Address: **1361 TEMBADA  
 MOUTIM  
 PERHEM, NORTH GOA  
 403512**

Date of First Issue: 20-04-2010

*Shivdar S Morzo*



Copy applied on 29/10/2025  
Date of delivery 31/10/2025  
Copy ready on 31/10/2025  
Copying & xeroxing fees R8.12/-  
Order receipt No. 1205 Dated 31/10/2025



From:

Mr. Anil Prabhakar Naik  
Resident of 64/F Parel Village,  
Parel Mumbai- 400012

Dated: 25<sup>th</sup> April' 2022

To, The Member Secretary  
Goa Coastal Zone Management Authority  
Having office at Patto Panaji, Goa.

O/o Member Secretary  
Goa Coastal Zone Management Authority  
C/o Department of Environment & Climate Change  
Dempo Tower 4th Floor  
Patto Plaza Panjim Goa - 403001

**Sub: Complaint against Mrs Lourdin D'Silva, Mr. Kundan Shashikant Morje, Mr. Vishal alias Dipin Shriodkar Morje, Mr Trivikram Jaidev Morje & Mr. Shamsundar Ramnath Bhosle alias Vagalkar, Dilip Mangesh Morje, one Mrs. D'Souza, and her family members all resident of Temb-Wada, Morjim Pernem Goa for carrying out illegal and unlawful constructions in utter Violation of CRZ rules (Goa Coastal Zone Management Authority) in the property bearing Survey no. 119/3 of Village Pernem-Goa.**

Sir,

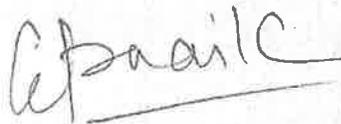
1. I am the co- owner of the property known as Temb-wada bearing Survey no. 119/3, admeasuring an area of 16240 sq. mtrs. situated in Morjim, Pednem-Goa and is bounded as under:  
North: by property bearing Survey nos. 119/3;  
South: by property bearing survey no 119/4 and 119/4A;  
East: by road;  
West: by property bearing Survey no. 119/3A.

2. By this complaint I am complaining against Mrs Lourdin D'Silva, Mr. Kundan Shashikant Morje, Mr. Vishal alias Dipin Shridhar Morje, Mr. Trivikram Jaidev Morje & Mr. Shamsundar Ramnath Bhosle alias Vagalkar, Dilip Mangesh Morje, one Mrs. D'Souza, and her family member all resident of Temb-Wada, Morjim Pernem Goa for carrying out illegal and unlawful constructions in utter Violation of CRZ rules (Goa Coastal Zone Management Authority) in the property bearing Survey no. 119/3 of Village Morjim Pernem Goa and are also carrying out commercial business therein and have also brought and placed in the property construction materials in order to carry out further construction therein.
3. As you are aware that the above referred property is defined as Eco Sensitive Turtle Nesting Area and on this ground as well they are not entitled to carry out any illegal and unlawful constructions since the above referred property is situated within within 300 mtrs. High tide line and is listed as a Non Development Zone.
4. That such illegal Acts of carrying out illegal construction, encroachment, extensions after extensions are contrary to the CRZ rules are illegal and liable to be demolished by taking immediate action in the matter and restoration of the land to its original condition.

You are therefore requested to take immediate action on the said matter.

Thanking you,

Yours faithfully,



Mr. Anil Prabhakar Naik

Mr. Anil Prabhakar Naik  
Resident of 64/F Parel Village,  
Parel Mumbai-400012  
Dated: 14/07/2022

16

To, The Member Secretary  
Goa Coastal Zone Management Authority  
Having office at Patto Panaji, Goa.

Secretary 15/07/2022  
Coastal Zone Management Authority  
Climate Change  
District Office Panaji  
Patto Plaza Panaji Goa - 403301

Sub: Refer to my complaint dated 25/04/2022 filed against Mrs Lourdin D'Silva, Mr. Kundan Shashikant Morje, Mr. Vishal alias Dipin Shridhar Morje, Mr Trivikram Jaidev Morje & Mr. Shamsundar Ramnath Bhosle alias Vagalkar, Dillip Mangesh Morje, one Mrs. D'Souza, and her family members all resident of Temb-Wada, Morjim Pernem Goa.

Sir,

1. I had lodged a complaint dated 25/04/2022 in respect of the property bearing survey no. 119/3 of Village Pernem-Goa against above persons on account of illegal and unlawful construction being carrying out in utter Violation of CRZ rules.

2. In the said complaint there is a clerical error in typing the middle name of Mr. Vishal alias Dipin Shridhar Morje whose middle name is wrongly typed as Shirodkar Morje instead of Shridhar Morje.

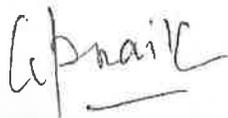
You are therefore requested to kindly read his full name as **Mr. Vishal alias Dipin Shridhar Morje** in the following manner.

**"Mr. Vishal alias Dipin Shridhar Morje"**

Besides the above correction, there are no other correction in the letter and you are kindly requested to take immediate action against CRZ Violators and obliged.

Thanking You

Yours Faithfully



Mr. Anil Prabhakar Naik

17  
479

**GOA COASTAL ZONE MANAGEMENT AUTHORITY**

C/o Department of Environment (Govt. of Goa)

4<sup>th</sup> Floor, Dempo Tower, Patto Plaza,

Panaji - Goa- 403001

email: [www.gzma.goa.gov.in](http://www.gzma.goa.gov.in)

Ref. No. GCZMA/N/ILLE-COMPL/22-23/35/389

Date: 09/08/2022

To,  
The Chairman,  
District Level Committee,  
Office of the Collector (North),  
Collectorate Building, Panaji-Goa.

**Sub:** Refer to my Complaint dated 25/04/2022 filed against Mrs. Lourdin D'Silva, Mr. Kundan Shashikant Morje, Mr. Vishal alias Dipin Shirodkar Morje, Mr. Trivikram Jaidev Morje & Mr. Shamsundar Ramnath Bhosle alias Vagalkar, Dilip Mungesh Morje, one Mrs. D'Souza and her family members all resident of Temb-Wada, Morjim Pernon Goa.

**Ref:-** 1) Order no. 2-18-2016/ENV/425 dated 14/09/2017.  
2) Ref. No. GCZMA/N/ILLE-COMPL/22-23/35/389  
3) Letter Dated 15/07/2022

Sir,

The Office of the Goa Coastal Zone Management Authority is in receipt of a letter dated 15/07/2022 from Anil Prabhakar Naik, wherein he has stated that there was a clerical error in typing the middle name of Mr. Vishal alias Dipin Shridhar Morje whose name was wrongly typed as Mr. Vishal alias Dipin Shirodkar Morje instead of Shridhar Morje. (copy of the said complaint letter dated 15/07/2022 is enclosed herewith for your reference).

The initial complaint dated 25/04/2022 has been forwarded to your office vide letter ref. no. GCZMA/N/ILLE-COMPL/22-23/35/389.

Encl.: As above

Yours faithfully,

  
((Dasharath M. Redkar)  
Member Secretary, GCZMA

Copy to:

✓ Anil Prabhakar Naik,  
R/o. H.No. 64/F,  
Parel Village,  
Parel Mumbai.

480

Exhibit R-9

18

# ANKUR KUMAR & ASSOCIATES

**Advocates & Legal Consultants**

Goa Office:- 2<sup>nd</sup> Floor, Alanakar Apartment, St. Mary Colony,  
Miramar -403001

**Telephone No:** 9384503190 **Email:** [ankurtnnls.18@gmail.com](mailto:ankurtnnls.18@gmail.com)

Date: 02/12/2025

## LEGAL NOTICE

**By Registered-AD Post/By Courier/By  
Whatsapp Message**

To,  
Member Secretary,  
GCZMA,  
Dempo Towers, Panaji, Goa  
India -403001

**In re:-**Correction of Name of the Alleged Violator Dipin Shridhar Morje in Reference No. GCZMA/N/Ille-Compl/22-23/35/Part IV/3732 vide dated 10/02/2025.

Sir

That I acting on the instruction of and for and on behalf of my client namely Shri. Anil Prabhakar Naik, S/o late Prabhakar Shambhoo Naik, R/o – 64/F, Parel Village, Parel, Mumbai -400012.

1. That the Goa Costal Zone Management Authority has passed the demolition orders for the demolition of illegal structures in Sy. No. 119/3, Tembwada, village Morjim, Goa CRZ area.

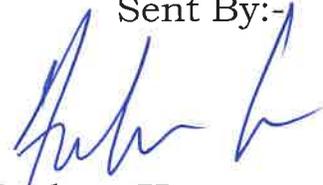
2. That my client, on 25/04/2022, filed a complaint before GCZMA against illegal construction by various violators in the Sy. No. 119/3, Tembwada, Village, Morjim, Pernem-Goa. And one of the violators, namely Dipin Shridhar Morje for illegal construction in Sy. No. 119/3, Tembwada of village, Morjim, Perenem, Goa. The copy of complaint vide dated 25/04/2022 is marked and annexed as **EXHIBIT R-1.**
3. That on 14/07/2022, my client made a fresh representation on the complaint dated 25/04/2022 for a clerical error in typing the middle name of the violator, namely Vishal alias Dipin Shridhar Morje, whose middle name is wrongly typed as ShriodkarMorje instead of Shridhar Morje. The copy of the representation dated 14/07/2022 is marked and annexed as **EXHIBIT R-2.**
4. That on 09.08.2022, you noticeeand took cognisance of the same and replied to my client about the correction of the name of the violator, namely Vishal alias Dipin Shridhar Morje. The copy of the reply vide dated 09.08.2022, is marked and annexed as **EXHIBIT R-3.**
5. That on 10/02/2025, you noticee vide ref No. GCZMA/N/Ille-Comp/22-23/35/Part IV/3732 passed the impugned order and made error in the name of the alleged violator and put Shridhar Morje instead of Vishal alias Dipin Shridhar Morje. The copy of order vide dated 10/02/2025, vide ref No. GCZMA/N/Ille-Comp/22-23/35/Part IV/3732 is marked and annexed as **EXHIBIT R-4.**

6. That I request to rectify and amend the name of the alleged violator from Shridhar Morjeto Vishal alias Dipin Shridhar Morje of demolition orders passed by the Goa Coastal Zone Management Authority within **5 days** from issuance of this notice.

That my client has clearly instructed me to initiate proceedings before the Constitutional Court against you if you fail to reply to this notice within **5 days** from the issuance of this notice.

A copy of the instant notice is retained in my office for further necessary action.

Sent By:-



**Ankur Kumar**

Advocate  
Mob – 9384503190

Copy to:-

1. Dy. Collector, Pernem, Goa
2. Mamlatdar, Pernem, Goa