

**BEFORE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 1144/ 2024**

**IN THE MATTER OF:**

**MOHAN SINGH BAGDRI**

**...APPLICANT**

**VERSUS**

**STATE OF UTTARAKHAND & ORS. ...RESPONDENTS**

**N.D.O.H – 24.03.2025**

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**PLACE – NEW DELHI**

**DATE: 19.03 2025**

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RESPONDENT NO. 5

THROUGH

*Rawat*

AKHILESH SINGH/ SUYASH SINHA /ARPITA RAWAT  
(ADVOCATES)

CHAMBER NO. 175, BLOCK -II,  
LAWYER'S CHAMBER BLOCK,

DELHI HIGH COURT,

OFF: C-57,LGF

DEFENCE COLONY

NEW DELHI-110024

BEFORE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
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**IN THE MATTER OF:**

MOHAN SINGH BAGDRI

...APPLICANT

VERSUS

STATE OF UTTARAKHAND & ORS. ...RESPONDENTS

**ADDITIONAL REPLY BY M/S VIJAY BUILDER IN  
COMPLIANCE WITH THE ORDER DATED 08.01.2025**

**MOST RESPECTFULLY SHOWETH:**

1. The present Additional response has been filed on behalf of the Respondent No. 5, namely, M/s Vijay Builders pursuant to the directions given by this Hon'ble Tribunal vide order dated 14.02.2025.
2. That the construction work of Semlata to Kafna Satni Motor Road in development block Jakholi was started on 16.10.2018 and completed on 07.07.2022. It is pertinent to inform this Hon'ble Tribunal that the Respondent no. 5 has duly complied with the terms and conditions specified in the Contract Agreement No.-54/UT-10-39(I)/XVI/CE-URRDA/2018-19 Date 11-10-2018 both in letter and spirit.
3. In compliance of paragraph No. 2 of the order dated 14.02.2025, the requisite particulars regarding muck generated, utilized and disposed off are as follows:

S. NO.	TOTAL DEBRIS	MATERIAL DISPOSAL BY CARTAGE	REUSED MATERIAL FOR ROAD CONSTRUCTION	TOTAL DISPOSAL IN DUMPING ZONE	BALANCE DEBRIS
1.	289184.48	120750.75	168433.73	120750.75	0.00

4. In compliance of Paragraph No. 5 of of the order dated 14.02.2025, Video clips/ Google Images showing the position of the sites in question before and after execution of the project are duly annexed with the present additional reply in a pen drive as ANNEXURE-A (Colly.).
5. It is submitted that the wire cages installed for the protection of the bhardari gaad constructed at the identified site were damaged due to debris emitted during landslide from the upper part of the road during rainy season. A wire fence has been erected parallel to bhardari gaad by the answering Respondent No. 5 at the place identified by the department due to which there is no possibility of any further water getting drained from bhardari gaad in future. Images of wire crates installation wall constructed already attached in original reply.
6. It is submitted that the Answering Respondent undertakes to furnish any other/further information if called upon by this Hon'ble Tribunal.

**PRAYER**

In light of the foregoing, it is most humbly prayed that this Hon'ble Court may graciously be pleased to:

- i. Remove/Delete the Answering Respondent from the array of Respondents, by observing its compliance with all applicable rules and guidelines and/or;
- ii. Pass any other orders as this Hon'ble Tribunal may deem fit in the interest of justice and as per facts and circumstances of the case.

**Place: New Delhi**

**Date:**

**THROUGH**



**AKHILESH SINGH/ SUYASH SINHA /ARPITA RAWAT  
(ADVOCATES)  
CHAMBER NO. 175, BLOCK -II,  
LAWYER'S CHAMBER BLOCK,  
DELHI HIGH COURT,  
OFF: C-57,LGF  
DEFENCE COLONY  
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**AFFIDAVIT**

I, Bishamber Bhatt, S/O Jaikrishnan Bhatt, Partner of M/s Vijay Builder having its registered office at Hotel Vijay Palace, Kedarnath Road, Tilwara, Rudraprayag do hereby solemnly affirm and declare as under:

- I. That I am the Partner of the Respondent No. 5 firm namely, M/s Vijay Builder in the captioned matter and am well conversant with the facts and circumstances of the present case and therefore competent to affirm the present affidavit.
2. That I have read and understood the accompanying Response and state that the contents thereof relating to facts are true to my knowledge on the basis of the records maintained by the Respondent Firm in the ordinary course of business.

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**DEPONENT**



18 MAR 2025  
VERIFICATION

Verified at New Delhi on 18.03.2025 that the contents of the above affidavit are true and correct to the best of my knowledge on the basis of the records maintained by the Respondent Firm in the ordinary course of business and that nothing material has been concealed therefrom.

*Sahil Rana (Adv.)*  
I identified The Deponent who has signed & thumb in my presence



*B2*  
**DEPONENT**

CERTIFIED THAT THE DEPONENT  
Shri./Smt./Km. *Bishamber Bhatt*  
S/o W/o D/o... *MS of J.K. Company*  
R/o...  
Identified by Shri/Smt. *Sahil Rana*  
has solemnly affirmed before me at  
Delhi on... at Sl. No. *58/25*  
that the contents of the affidavit which have  
been read & explained to him are true and

18 MAR 2025

*Sa*  
Oath Commissioner, Delhi



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**Additional Reply in the matter of Mohan Singh Bagdri Vs State of Uttarakhand & Ors.**

1 message

**Digvijay Singh Rawat** <digvijay17rawat@gmail.com>

18 March 2025 at 13:54

To: "mohans.bagari1958@gmail.com" &lt;mohans.bagari1958@gmail.com&gt;

Sir,

Please find attached our additional reply with videos/photographs to the above mentioned matter for your kind perusal.

Thanking You,  
Digvijay Singh Rawat,  
Advocate  
8171283333

 NGT

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 **NGT Reply.pdf**  
1682K

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Annexure - A (COLLY) - [PENDRIVE]

ORIGINAL APPLICATION → No. 1144/2024

MOHAN SINGH BAGDRI

VS

STATE OF UTTARAKHAND & ORS.