

BEFORE THE NATIONAL GREEN  
TRIBUNAL, PRINCIPAL  
BENCH, DELHI

Original Application 134/2022 and  
267/2022

In the Matter of :  
NGT Bar Association Legal Aid Committee  
-Applicant

Vs.  
Madhu Kamboj --- Respondent

Next Date: 01.05.2024

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NEW DELHI

DATED: \_\_ April 2024

  
Madhu Kamboj

Respondent

  
Subey

Through Counsels

BEFORE THE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, DELHI

Original Application 134/2022 and 267/2022

In the Matter of :

NGT Bar Association Legal Aid Committee --- Applicant

Vs.

Madhu Kamboj --- Respondent

Comprehensive Affidavit by Respondent Madhu  
Kamboj

MOST RESPECTFULLY SHOWETH: -

- 1.** That the OA 134 and OA 227 concerning the construction of petrol pump on KHASRA No. 1081 near Mothrowala Road, Dehradun. The establishment of the aforementioned petrol pump adheres to all necessary approvals and complies with building bylaws. Regrettably, these applications were filed by individuals closely associated with Mr. Trilok Semwal, who operates a competing petrol pump on the same Mothrowala Road, potentially motivated by business rivalry rather than genuine

concerns about environmental impact or regulatory compliance.

**2.** That the IOCL EVALUATION COMMITTEE thoroughly inspected the proposed site before granting approval. They provided written confirmations and reports on multiple occasions (documents already shared/on record), affirming that the Petrol Pump approval was secured prior to the Notification of CPCB dated January 7, 2020. Furthermore, CPCB clarified that the said Notification would not be applicable to Petrol Pumps whose initial approval was granted before January 7, 2020. Consequently, all other required approvals were also obtained subsequently.

**3.** It inapposite ton state that the guidelines set forth by the Central Pollution Control Board (CPCB) as applicable to the case, it is imperative to note that the applicant/Respondent have duly secured approvals from all requisite authorities, including but not limited to the SSP, Fire Officer, MDDA, DDM, PWD, and the District Supply Officer. It is emphasized that the applicant actions remain fully compliant with the stipulated guidelines.

**(a)** Joint Committee Report –(Pg 3. - Factual Report)

- i. Reference Point II. (ii): The committee has highlighted Sierra International School, situated 12 meters from the filling point.

Prior to deliberating on this matter, it is imperative to take into account that a Right to Information (RTI) response from the Land Department, dated 06.01.24 **(Annexure 1)**, explicitly states that there is no approved school map for the land north of the petrol pump. Contrary to it the map for house has been sanctioned.

Essentially, no formal authorization has been granted by the relevant authorities ie MDDA for the operation of a school at that location. The construction of the school is unauthorized and illegal, without having any sanctions from competent authority. In fact the bald statement given by Ld. DM during court proceedings were not substantiated with any documents and was made in haste without confirming from their good offices. The sanction letter pertains to the school with similar name as situated 300 metre away from the premises in question.

Consequently, labeling respondent's petrol pump as illegal due to the school's presence is a misinterpretation of the situation. In reality, it is the school that is in breach of regulations, having been constructed without the requisite permissions from the authorities.

Action should be taken by the authorities to remove/relocate the schools from that location as it doesn't exist on the government records . However, School Authorities are aware that they are running illegally and that is the reason that the school is intended to relocate. As per recent updates, construction of the school building is underway at a location situated 300 meters away from the Petrol Pump . The Approved Map and Sanction letter of Sierra International school and report of patwari (Refer **Annexure 2 & 3 & 4**).

In the meantime, the Applicant can take additional safety measures as prescribed by PESO , in the guidelines of CPCB.

- ii. Reference Point II. (iii): *In the South-East direction, one residential house is situated within the 40 meters distance of fill point/ dispensing units.*

*This is well within the criteria, as minimum distance should be 30 meters atleast and no high tension wire is crossing above the premises.*

5. The petitioner, Tejasvi Chandra, has voluntarily withdrawn the application.

The withdrawal reasons are best known to her but government records clearly indicates that the school in question is

operating illegally and is not officially documented. It is pertinent to mention that Mr Anshul Kamboj has given a written undertaking on 29th June 2021 stating that online classes are being conducted which is already on record. So therefore in this scenario there were no children coming at the premises since there was complete lockdown at all educational institutions. The letter purports to create an evidence exhibiting that school was operating which is contrary to CPCB guidelines for the running of petrol pump. In fact the school children safety is being compromised by Sierra International , by making the school children as a pawn by compromising their safety. As the school does not even have Fire NOC for running of a school at Mothorawala. The safety is compromised to settle scores with the respondent herein. By no stretch of imagination it can be assumed that petrol pump could be run without IOCL AUTHORISATION. The premises in question was physically inspected by the IOCL officials before granting any permissions.

- 6.** In the event of any demolition, it is the school building that warrants attention, since it does not have Fire NOC, relevant permissions from MDDA. The crux of this matter lies in pure business rivalry, where the complainants, having secured various exemptions, conveniently overlook their own petrol

pump's location amid congested roads, commercial, and residential areas (**Refer Annexure 5** for photo of the other petrol pump on the same road which belongs to the Competitor Trilok Semwal).

7. THE writ petition no 891 of 2024 was filed before the High Court of Nainital Seeking relief of cancellation of the NOC granted by the DM, Dehradun dated 28th March 2024. The Hon'ble High court after hearing the arguments was pleased to allow the writ petition by order dated 9th April 2024 for quashing the order passed by the Ld DM, Dehradun giving opportunity of four weeks to follow the due process of law before passing any orders after hearing the parties. The order is annex herewith and marked as **Annexure 6**. It is further submitted that an application bearing diary no.....is being filed before the Hon'ble High Court seeking extension of time to deal the matter in controversy. The RTI applications are filed before various authorities to show that the schools adjoining the petrol pump is unauthorised/illegal and without any relevant provisions of various authorities. The replies have not been received from various authorities, therefore the time for extension is being sought. However, representation have also been made to Ld DM for extension of time to deal with the matter as various records are being sough through the RTI's

from various authorities. The Copy of of the same is annex herewith and marked as **Annexure 7**.

**8.** That, no formal authorization has been granted by the relevant authorities for the operation of a school at that location. The construction of the school is unauthorized and illegal against which the Applicant/Respondent had made a complaint against the Sierra International School. The copy of complaint is annex herewith and marked as **Annexure 8**.

**9.** Consequently, labelling respondent's petrol pump as illegal due to the school's presence is a misinterpretation of the situation. In reality, it is the school that is in breach of regulations, having been constructed without the requisite permissions from the authorities. Action should be taken by the authorities to remove/relocate the schools from that location as it doesn't exist on the government records . The copy of show cause notice to the Sierra International school by MDDA is annex herewith and marked as **Annexure 9**.

**10.** That it is pertinent to mention that the Sierra International school had failed to provide substantial documents before MDDA against which the **MDDA had order for sealing of the school**. The same has been annex as **Annexure 10**.

**11.**It is pertinent to mention that the various documents which are necessary for the matter in controversy are annex herewith to show the ulterior motive and malafide intention of the Sierra international and the complainant herein. The copies of said RTI's and complaint are annex herewith and marked as **Annexure 11 & 12** respectively.

It is therefore most respectfully prayed that the present Original Application 134 and Application 227 be dismissed for the reasons stated above collectively read with all our responses till date and pass such further order or orders as this Hon'ble Tribunal deems fit in the interest of Justice and Equity.

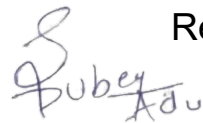
NEW DELHI

DATED: \_\_ April 2024

  
Madhu Kamboj

Madhu Kamboj

Respondent



Through Counsels



BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

Original Application 134/2022 and 267/2022

In the Matter of :

Tejasvi Chandra  
Substituted  
NGT Bar Association  
Legal Aid Committee

.....Applicant

Vs

Madhu Kamboj

.....Respondent

Affidavit

Affidavit of Madhu Kamboj, age about 58 years, W/o Shri Ravindra Kumar, Kamboj,  
R/o Darshan Kunj, New Canal Road, Mothrowala, Dehradun, Uttarakhand-248001

..... Deponent

The above named deponent does hereby solemnly affirm and declare as under :-

1. That I am the deponent and I am familiar with the facts of the case and as such competent to swear the present affidavit.
2. That the accompanying reply has been drafted by my counsel under my instructions and the contents of the same are true and correct to my knowledge

*Madhu*  
..... Deponent

Verification

Verified at Dehradun on this 29<sup>th</sup> Day of April, 2024, that the contents of my above affidavit are true and correct to my knowledge. No part of it false, nothing material has been concealed therefrom.

S. N 2962  
This affidavit is sworn before me by  
Shri.....  
who is identified by Shri *Madhu Kamboj*  
at Dehradun on.....

*Madhu*  
..... Deponent

*29/4/24*  
(Rajender Singh Negi)  
Advocate & Notary, Dehradun

निर्धारित  
01/10/2024

I.P. (निकट प्रकल्प)  
05/10/2024

2213/2324  
21/1/2024

सूचना का अधिकार अधिनियम-2005

आवेदन पत्र

1-1-24

सेवा में

लोक सूचना अधिकारी,  
मसूरी-देहरादून विकास प्राधिकरण,  
देहरादून।

महोदय,

निवेदन है कि सूचना का अधिकार अधिनियम-2005 के प्राविधानों के अन्तर्गत मुझे निम्नलिखित सूचना की आवश्यकता है। कृपया वांछित सूचना उपलब्ध कराने का कष्ट करें-

1. आवेदक का नाम PIYUSH KAMBOJ
2. पिता/पति का नाम RAVINDER KAMBOJ फोन नं० 7900886600
3. व्यवसाय BUSINESS
4. स्थायी पता MOTHRWALA, SHYAM OIL PETROL PUMP,  
D.D.M./UTTARAKHAND 248001
5. पता जिस पर सूचना भेजी जायेगी 99

- (क) नाम 99  
 (ख) स्थान 99  
 (ग) अकधर या पुलिस थाना 99  
 (घ) जिला एवं राज्य 99

6. सूचना (जो मांगी गयी है) का विवरण: सूचना नं० 1081 (23) से कि 2019 से  
सूचना नं० 1081 (23) से कि 2019 से  
 7. क्या आवेदक गरीबी रेखा के नीचे (बी.पी.एल.) की श्रेणी में आता है (यदि इस श्रेणी के अन्तर्गत है तो पुष्टि हेतु प्रमाण प्रस्तुत करें)  
 8. आवेदन के साथ संलग्न दस्तावेजों की सूची

हस्ताक्षर,

दिनांक:- 26/1/24

1-1-24

(आवेदक का नाम)  
7900886600  
MOTHRWALA  
D.D.M.

सूचना का अधिकार अधिनियम-2005

संलग्नक-10  
सूचना प्रेषण हेतु प्रपत्र

कार्यालय लोक सूचना अधिकारी/DLDA MDDA  
पत्र सं० - RTI/MDDA/2213/23-24

SH, PIYUSH KAMBOJ  
MOTHRAWALA INDIAN OIL PETROL PUMP  
Dehradun, Uttarakhand, 248001

कृपया लोक सूचना का अधिकार अधिनियम, 2005 के तहत आपका सूचना अनुरोध पत्र दिनांक 01-01-2024 जो कि इस कार्यालय में दिनांक 01-01-2024 को प्राप्त हुआ है, जिसमें आपके द्वारा 1 बिन्दु पर सूचना चाही गयी है, के सम्बंध में सम्बंधित पटल से आख्या प्राप्त की गई, जिसके अनुसार सूचना निम्न प्रकार है :-

बिन्दु संख्या 1: AS PER APPLICATION ATTACHED

जवाब - प्राधिकरण के आई0टी0 अनुभाग की आख्यानुसार मौजा-मोथरावाला देहरादून के भूखण्ड खसरा नम्बर 1081ख में कोई मानचित्र स्वीकृत होना नहीं पाया गया है।

यदि उपरोक्त सूचना से असंतुष्ट हो तो 30 दिन के अन्दर विभाग के प्रथम अपीलीय अधिकारी जिनका नाम व पता निम्नवत् है अपील दायर कर सकते हैं:-

प्रतिलिपि:

प्रथम विभागीय अपीलीय अधिकारी का पता-  
Raza Abbas  
Joint Secretary  
DLDA MDDA  
दूरभाष 1356603122

SHANTI SINGH RAWAT  
लोक सूचना अधिकारी  
Executive Engineer  
DLDA MDDA

Digitally signed by SHANTI SINGH RAWAT  
Date: 2024.01.06 11:40:33 +05:30  
Reason: eASE App document signing  
Location: Dehradun

Page 1 of 1

**ZOT**  
**ANNEXURE 2,3, and 4**



**MDDA Dehradun Development Authority**

Transport Nagar, Saharanpur road,  
Near ISBT, Dehradun-248001  
(Uttarakhand) INDIA

Phone : +91 135 6603100  
Fax : +91 135 6603103  
Email : info@mddaonline.in  
Website : www.mddaonline.in

Sanction Letter

Map No C-0345/20-21/RE1/RE1/RE1  
Sector Sector 3

Date 07/04/2022

To,  
SHIMLA DEVI  
Mothrowala, Dehradun, U.K.  
Dehradun-248001

ANSHUL KAMBOJ  
MOTHROWALA, DEHRADUN, U.K.  
Dehradun-248001

Your application dated 2021-07-28 21:30:05.0 regarding construction (with enclosed map) proposed by you situated at, khasra no.- 1190 & 1191 ka, Mauza- Mothrowala, Pargana -Parwadon, Dehradun, U.K., Dehradun-248001 has been accepted with the following term and conditions.

1. The road service lane or the government land shall not be used for putting any building construction material and the arrangement of sewage shall be done by self.
2. If there is any tree in construction area; before cutting it, approval must be taken.
3. The approval of the map will not be considered as ownership of the map and in any court this map will not be considered as proof of land ownership.
4. In summer season, keeping in view the drinking water scarcity, between 15th April to 30th June; the construction will not be done.
5. In case if there is change in name of the building owner in the approved map or renaming the building, it is mandatory to inform the authority.
6. In road widening area if there is any violation of boundary wall, gate or public land, the approval will stand cancelled automatically.
7. For any development work in future, if development charges are asked, shall be payable without any objection. If required, additional development charges for any project development work in the same area shall be paid without any objection, so that the development work of the area could be done from the development charges received from the same area.
8. During the building construction, earthquake and other security measures must be considered.
9. By approval of this map, the rights and ownership of any government department or local body or any individual in the government department is not affected.
10. The government or the local body will not be responsible for any development work in the area which is not suitable for the development work.
11. After getting the approval if the court cancels the ownership of the applicant the approval will stand cancelled automatically.
12. The Map will be used for the same purpose for which it has been approved, if there is any deviation in purpose, the whole construction will be considered invalid.
13. After getting the approval, at any point of time if the Vice Chairman or any other authorized person finds out the approval has been taken by hiding the facts or by submitting the forged documents the office will have right to

Digitally signed by HARICHAND SINGH RANA  
Date: 2022.06.21 15:40:18 IST

Reason: Online Map Approval  
Location: Dehradun  
Sierra International School  
Mothrowala, Dehradun.

Page 1 of 2  
Sierra International School  
Mothrowala, Dehradun.

Deepla  
Principal  
Sierra International School

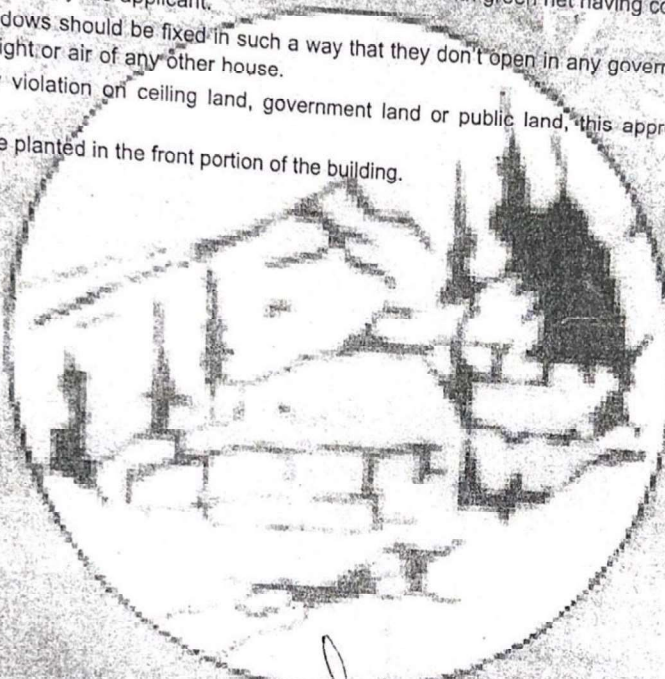


## Mussoorie Dehradun Development Authority

Transport Nagar, Saharanpur road,  
Near ISBT, Dehradun-248001  
(Uttarakhand) INDIA

Phone : +91 135 6603100  
Fax : +91 135 6603103  
Email : info@mddaonline.in  
Website : www.mddaonline.in

- cancel the approval and in that case the construction under the map will stand cancelled.
14. Hill cutting will not be done from any hilly terrain.
  15. One approved copy of the map shall always be kept at the construction site so that it can be investigated at any time. The construction will be done as per the approved map specifications and the applicant shall be responsible for ownership of the building.
  16. This map is valid for five years from the date of approval, after that no construction work will be done.
  17. After the completion of the construction work, within 3 months of the completion according to the approved map, certificate should be obtained from the authority then only the building should be used else the approval will be cancelled.
  18. During the construction, the covering of the construction site with green net having covered area 1000 sq.m. or more shall be done by the applicant.
  19. Doors and windows should be fixed in such a way that they don't open in any government land or road and do not affect the light or air of any other house.
  20. If there is any violation on ceiling land, government land or public land, this approval will stand cancelled automatically.
  21. 2 trees must be planted in the front portion of the building.



*[Signature]*  
Manager

Sierra International School  
Mothrowala, Dehradun.

*[Signature]*  
Manager

Sierra International School  
Mothrowala, Dehradun.

*[Signature]*  
Principal

Sierra International School

Digitally signed by HARICHAND SINGH RANA  
Date: 2022.06.21 15:41:04 IST  
Reason: Online Map Approval  
Location: Dehradun

Design subject to applicable building codes  
 Date: 12/27/19 10:13:03 AM (GMT+05:30) - Wednesday  
 User: Shrikanth Reddy (shrikanthreddy@rediffmail.com)  
 Project: SIERRA INTERNATIONAL SCHOOL, MOHROWALA, DEHRADUN, U.K.  
 Drawing: ARCHITECTURAL DRAWING - SECTION  
 Drawing No: SIERRA-INTL-SCHOOL-191227-01

PROPOSED PRIMARY SCHOOL PLAN FOR  
 MRS SHIMLA DEVI W/O LATE JAI KUMAR  
 KAMBOJ AND MR ANSHUL KAMBOJ S/O  
 LATE JAI KUMAR KAMBOJ, SITUATED  
 AT KHASRA NO 1190 AND 1191 KA, MAUZA -  
 MOTHRWALA, PARGANA-PARWADOON,  
 DISTT.- DEHRADUN, U.K.

**AREA STATEMENT**

1. TOTAL PLOT AREA AS PER MUTATION = 2871.26 SQ.MT.
2. TOTAL PLOT AREA AS PER SITE = 2787.96 SQ.MT.
3. ROAD WIDENING AREA = 198.79 SQ.MT.
4. NET PLOT AREA = 2587.25 SQ.MT.
5. PROPOSED GUARD ROOM AREA (NON FAR) = 11.99 SQ.MT.
6. PROPOSED GROUND FLOOR AREA STILT = 855.91 SQ.MT.
7. STAIR CASE AREA = 38.84 SQ.MT.
8. TOTAL GROUND FLOOR AREA STILT = 924.55 SQ.MT.
9. PROPOSED FIRST FLOOR COVD. AREA = 862.34 SQ.MT.
10. PROPOSED SECOND FLOOR COVD. AREA = 848.08 SQ.MT.
11. PROPOSED THIRD FLOOR COVD. AREA = 864.59 SQ.MT.
12. TOTAL COVERED AREA FOR (F.A.I.) = 2604.96 SQ.MT.
13. TOTAL COVERED AREA FOR (D.C.) = 3341.49 SQ.MT.
14. OPEN PLOT AREA = 1796.72 SQ.MT.
15. GROUND COVERAGE = 54.85 %
16. F.A.R. = 0.25
17. REG. PARKING (2644.85/100) X 1.25 = 33.06 E.C.E.
18. PROVIDED PARKING IN STILT (855.91/25) = 34.23 E.C.E.

**DOOR & WINDOW SCHEDULE**

TYPE	SYMBOL	WIDTH	HEIGHT
DOOR	D	4'-8"	7'-8"
DOOR	D1	3'-3"	7'-8"
DOOR	D2	3'-8"	7'-8"
DOOR	D3	3'-8"	7'-8"
WINDOW	W	14'-8"	3'-8"
WINDOW	W1	15'-8"	3'-8"
WINDOW	W2	8'-8"	3'-8"
WINDOW	W3	8'-8"	3'-8"
WINDOW	W4	4'-8"	3'-8"
WINDOW	W5	9'-3"	48'-8"
VENTILATOR	V	3'-8"	3'-8"

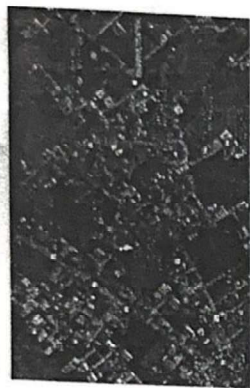
**SIG. OF ARCHITECT**

SCALE 1:100

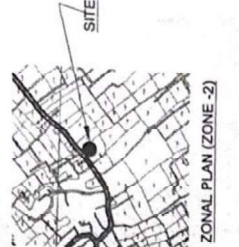
**SIG. OF OWNERS**

**SIG. OF STR. ENGINEER**

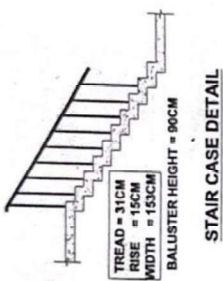
MAHMOUD S. MATARU  
 REGD. LICENSE NO. 10001  
 1, 2nd Fl. Road, Mohrowala, Dehradun



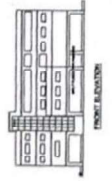
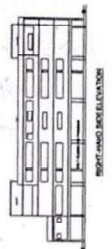
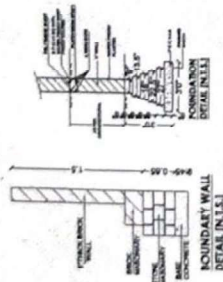
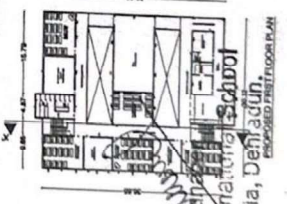
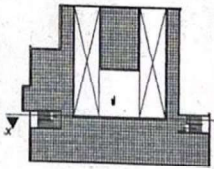
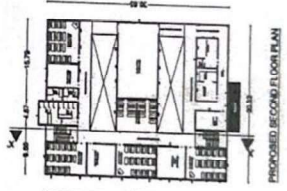
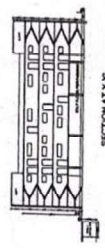
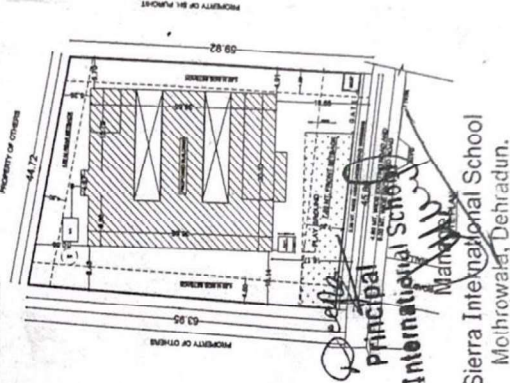
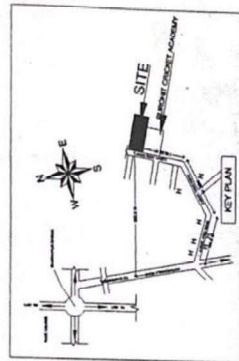
SITE



SITE



30°15'57.6"N 78°02'15.4"E  
 30.286012, 78.037601



LEGEND  
 1. MAIN WALL  
 2. EXTERIOR FINISH  
 3. INTERIOR FINISH  
 4. TERRAZZO FINISH

Principal  
 Sierra International School  
 Mohrowala, Dehradun.

Sierra International School  
 Mohrowala, Dehradun.

सेवा में,

श्रीमान तहसीलदार  
सदर देहरादून।

महोदय,

निवेदन इस प्रकार है कि प्रार्थी को मौजा मोथरोवाला, परगना परवादून, जिला देहरादून के खसरा सं० 1081क से खसरा सं० 1190 एवं 1191क के बीच की दूरी कितनी है, के दूरी प्रमाण पत्र की आवश्यकता है।

अतः महोदय से प्रार्थना है कि सम्बन्धित हलका लेखपाल/पटवारी से आख्या मंगवाकर प्रार्थी को उपरोक्त खसरा नम्बरों के बीच की दूरी का दूरी प्रमाण पत्र जारी करने की कृपा करें।

दिनांक ~~12/04/2024~~ <sup>12042024</sup>  
संलग्नक- खसरा नं० 1081क एवं  
खसरा नं० 1190 व 1191क की खतौनी  
की छायाप्रति

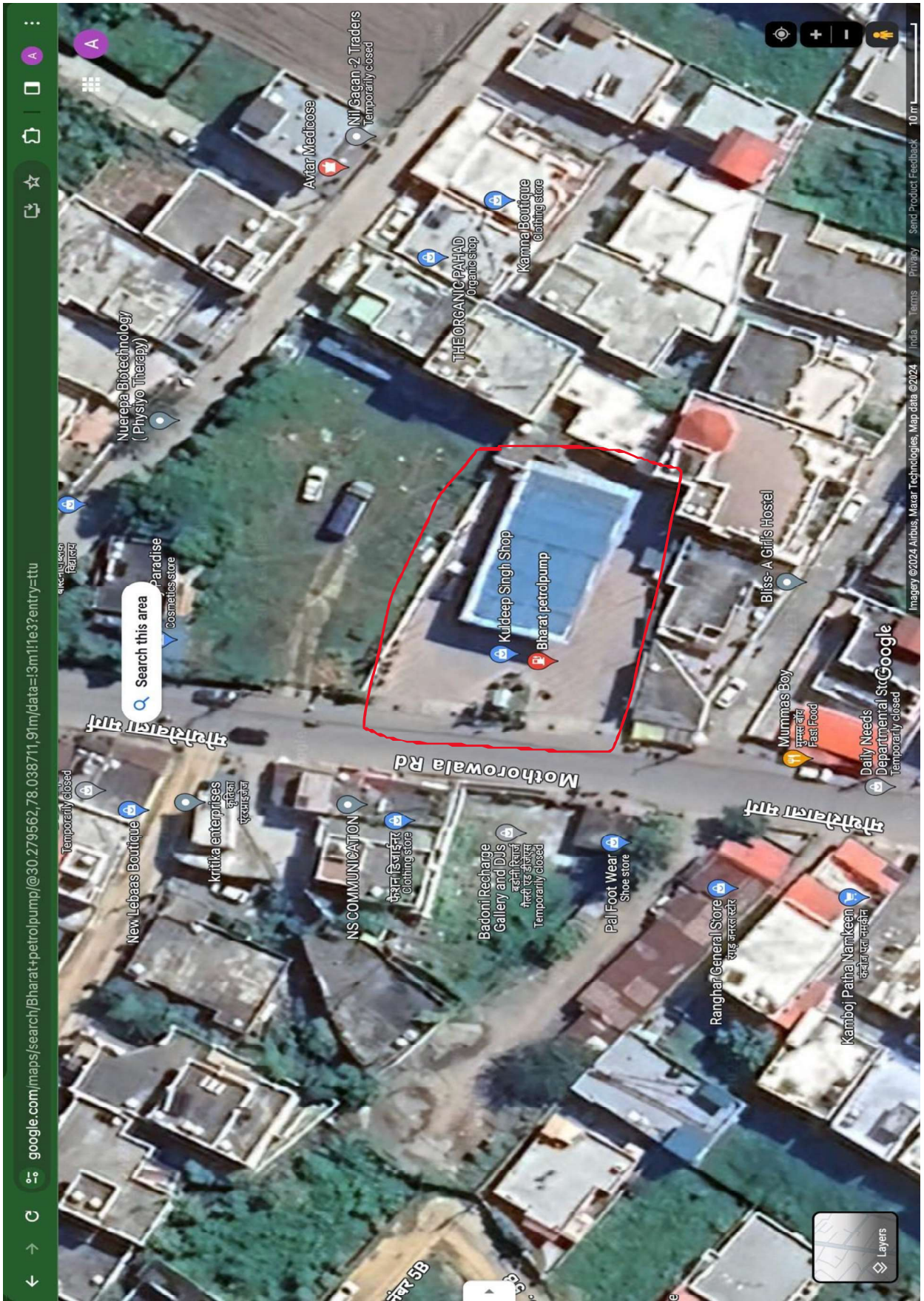
प्रार्थी  
(पियूष काम्बोज)  
पुत्र श्री रविन्द्र कुमार काम्बोज  
निवासी मोथरोवाला, देहरादून।  
मो० 7900886600

महोदय, संलग्न प्रमाण पत्र प्रार्थी श्री रविन्द्र कुमार काम्बोज  
पुत्र श्री रविन्द्र कुमार काम्बोज मो०- 7900886600  
के सम्बन्ध में आख्या इस प्रकार है कि उनके खसरा  
खसरा नं० 1081 से खसरा नं० 1190 की दूरी 300 मीटर  
है आख्या सेवा में प्रेषित है।

591

*Handwritten signature and scribbles*

23/04/2024  
कृपाल सिंह रावत  
मजस्र उप निरीक्षक  
आर. व. ला. आर.  
आर. व. ला. आर.





ANNEXURE 6  
289

BHUWAN BHATT || ADVOCATE || 9411538321 || 09-04-2024 04:16:05 PM



J52wink=

**IN THE HIGH COURT OF UTTARAKHAND AT NAINITAL**

**WPMS NO. 891 OF 2024**

**DISTRICT: DEHRADUN**

1 - SMT. MADHU KAMBOJ

..... Petitioner

Versus.

1 - DISTRICT MAGISTRATE

..... Respondent

**Petitioner Advocate: BHUWAN BHATT**

**Respondent Advocate: C.S.C.**



09-04-2024



No	Date	Office Notes, reports, orders or proceedings or directions and Registrar's order with Signatures	COURT'S OR JUDGES'S ORDERS
			<p>WPMS No.891 of 2024 <b><u>Hon'ble Manoj Kumar Tiwari, J.</u></b></p> <p>Mr. Bhuwan Bhatt, Advocate for the petitioner. Mr. Suyash Pant, Standing Counsel for the State of Uttarakhand.</p> <p>2. By means of this writ petition, petitioner has challenged the order dated 28.03.2024 passed by District Magistrate, Dehradun, whereby 'No Objection Certificate' issued to the petitioner under Rule 144(1) of Petroleum Rules, 2002 has been cancelled.</p> <p>3. Learned counsel for the petitioner contends that neither any notice nor any opportunity of hearing was given to petitioner before passing the impugned cancellation order. This, according to him, is in violation of provision contained in proviso to Rule 150(1) of the said Rules. Sub Rule (1) of Rule 15 is reproduced below:</p> <p>"150. Cancellation of no-objection certificate.-(1) A no objection certificate granted under rule 144 shall be liable to be cancelled by the District Authority or the State Government, if the District Authority or the State Government is satisfied that the licensee has ceased to have any right to use the site for storing petroleum:</p> <p>Provided that before cancelling a no-objection certificate, the licensee shall be given a reasonable opportunity of being heard."</p> <p>4. In paragraph no.23 of the writ</p>



petition, specific averment has been made that petitioner was not given any notice before cancellation the 'No Objection Certificate'.

5. Learned counsel for the petitioner has drawn attention of this Court to the judgment dated 09.04.2021 rendered by this Court in WPMS No.888 of 2021. Thus, he submits that the writ petition may be decided in terms of the said judgment.

6. Learned State Counsel submits that since the issue raised here is identical to the judgment relied upon by the petitioner, therefore, he has no objection, if writ petition is decided in terms of the said judgment.

7. Since the impugned cancellation order has been passed in violation of principles of natural justice, which has been engrafted in Rule 150(1) of the aforesaid Rules, therefore, the writ petition is allowed and the impugned cancellation order is set aside. The District Magistrate, Dehradun shall pass fresh order, within four weeks, but only after providing reasonable opportunity of hearing to petitioner.

**(Manoj Kumar Tiwari, J.)**

09.04.2024

*Arpan*

To,  
The District Magistrate  
Dehradun  
Uttarakhand

Subject: Application to enlarge the time to place additional documents on record for the just adjudication of the matter in controversy to bring to the lights of the facts of the case in hand.

MOST RESPECTFULLY SHOWETH: -

1. That the brief facts of the case are that the OA NO 134/2022 & 267/2022 is pending for adjudication before the Hon'ble National Green Tribunal, New Delhi and the NDOH is 1st May 2024.
2. That the Hon'ble office of LD District Magistrate, Dehradun, on receiving the order of the Hon'ble Tribunal dated 12.02.2024, constituted the committee and directed the Additional District Magistrate, Dehradun to jointly inspect the said outlet with Regional Officer, Uttarakhand Pollution Control Board. On 11.03.2024. The joint committee of Regional Officer, Uttarakhand Pollution Control Board, Dehradun and Additional District Magistrate (E), Dehradun conducted site investigation/inspection, in which it was found that the petrol pump does not meet the standards of the guidelines issued by the Central Pollution Control Board. That considering the report of Joint Committee the Ld DM was pleased to cancelled the NOC on dated 28th March 2024.
3. That the Applicant had filed the writ petition no 891/2024 before the Hon'ble High Court of Uttarakhand and had challenged the order dated 28.03.2024 passed by District Magistrate, Dehradun, against which the Hon'ble High Court had allowed the writ petition directing the LD DM to pass fresh orders within four weeks, but only after providing



*Madhun*

Date: - 31/03/2024

To,  
The Vice Chairman,  
MDDA  
Dehradun, Uttarakhand

Complaint Sierra International School , Address: Khasra No 1081, Mothorawala, Dehradun, Uttarakhand  
( MOB-9412004432).

Sir,

1. I *S/O Anshul Kamboj* s/o *Anurag Kamboj* R/O *Mothorawala* a law abiding citizen and a resident of *Mothorawala*, I am writing to formally complaint about Sierra International School, situated at Khasra No 1081 KHA is neither approved from the concerned authority nor have received any sanction letter from the respective/required department.

2. At the outset, I hereby establish that Mr Anshul Kamboj is a rightful ownership of the property, specifically identified as Khasra No 1081, Mothorawala, Dehradun.


3. It is pertinent to mention that the school is within 30 metres from the filling point. Prior to deliberating on this matter, it is imperative to take into account that a recent Right to Information (RTI) response from the Land Department, dated 06.01.24 (Annexure 1), explicitly states that there is no approved school map for the land north of the petrol pump. Contrary to it the map for house has been sanctioned.

4. It is pertinent to mention that that essentially, no formal authorisation has been granted by the relevant authorities for the operation of a school at that location. The construction of the school is unauthorised and illegal.

5. That the petrol pump is within the radius of 30metre from the school which is not only harmful but also contains threat to the life of the kids. Despite of knowing about the said status the school is playing with the lives of students.

6. The School is in breach of regulations, having been constructed without the requisite permissions from the authorities. Action should be taken by the authorities to remove/relocate the schools from that location as it doesn't exist on the government records . Map attached for reference.

(Annexure 2).However, School Authorities are aware that they are running illegally and that is the reason they the school is intended to relocate. As per recent updates, construction of the school building is underway at a location situated 500 meters away from the Petrol Pump . The Approved Map and Sanction letter,of Sierra International school.(Refer Annexure 3 & 4).

  
01/04/2024

7. That to the north of the Petrol Pump lies a parcel of land owned by Shri Anshul, and to the south, a parcel owned by Shri Gairola. This information is incontrovertible and substantiated by official records. It can readily substantiate this through an obtained Right to Information (RTI) response from the Land Department, which clarifies that there is no approved school map on the land north of the Petrol Pump. In essence, no formal authorization has been granted by the relevant authorities to operate a school at that location. It is evident that the school's operation at that site is in violation of the law. Upon inquiry, it was ascertained from school authorities that, due to the impact of the Covid-19 pandemic, construction of the approved school building has been temporarily suspended, and they are currently utilizing the site on an interim basis. Subsequently, the school is intended to relocate. As per recent updates, construction of the school building is underway at a location situated 500 meters away from the Petrol Pump.

8. The School has not adhered to and substantially complied with all prevailing environmental regulations, securing every requisite approval for the operation of the school at its presently designated location.

9. That Mr Anshul Kamboj has been in possession and occupation of the aforesaid property located as mention above. It is imperative to note that Mr Anshul Kamboj has not fulfilled the obligations as per the criteria laid down by the govt/deptt. Pursuant to the provisions delineated in sanctioning the school, it is explicitly stipulated that it is mandatorily to get the Fire NOC and various other prior sanctions. Regrettably, a grave and persistent default on his part has arisen in this regard throughout.

10. That it is imperative to emphasize that in accordance with the terms specified under clauses for the sanctioning of the school, Mr. Kamboj was legally obligated to get the prior approval. However, it has come to my attention that he has not obtained any approval.

Prayer:

It is therefore most humbly prayed that the authority concerned must take stringent action against the school and immediate issue necessary direction to close the school in the interest of safety of kids at large. I would be highly grateful to you.

Thanking You

Yours Sincerely

*Anshul Kamboj, Madhya Pradesh*  
*Indian Oil Petrol Pump*  
*Dehri*

Phone No 7960826660



सेवा में  
अधि कर्मी अधिका  
को देव विं गीवो  
देखना ।

विषय: - कां.सं. UGMS/MDDA/C/0016/2024 (27/1)  
को पुरी लेने के लिये दे

प्रमाणित है कि म.प.द.अ का कां.सं. C-0016/24-25  
को पुरी लेने के लिये उक्त कां.सं. (27) (1) को पुरी  
देने का मंडल प्र.स. क्र.सं. को भी केस को भी दे दे  
जाता काम ही जापान ।

दि 6-4-2024

प्रमाणित  
को पुरी लेने के लिये दे  
6/4/24

C.C.  
3/4/24  
P.O.

Received





Uttarakhand Housing & Urban Development Authority  
Department of Housing, Govt. of Uttarakhand  
Rajeev Gandhi Multipurpose Complex, Dispensary Road  
Dehradun - 248001 Telefax - 0135-2719500



MUSSOORIE DEHRADUN DEVELOPMENT AUTHORITY  
Transport Nagar, Saharanpur road, Near ISBT,  
Dehradun-248001 (Uttaranchal) INDIA  
GST No. 05AAAAAM4651Q1ZA

कारण बताओ नोटिस

62

आदेश/वाद संख्या : UCMS/MDDA/C/0016/2024/27(I)  
Sector-3

दिनांक: 05/04/2024

M/S MANEGER SIERRA INTERNATIONAL SCHOOL  
SIERRA INTERNATIONAL SCHOOL MOTHOROWALA DEHRADUN

उत्तराखण्ड नगर एवं ग्राम नियोजन तथा विकास अधिनियम, 1973 की धारा 27 (1) के अधीन नोटिस जो की आपके द्वारा उपरोक्त की धारा (14) में वर्णित आज्ञा / अनुज्ञा / स्वीकृति प्राप्त किये बिना या प्राप्त अनुज्ञा / स्वीकृति के शर्तों का उल्लंघन करते हुए (शर्तों का उल्लेख किया जाए)  
मौके पर पूर्व निर्मित भवन में स्कूल का संचालन किया जा रहा है मौके पर कोई स्वीकृति नहीं दिखायी गयी।

स्थल : SIERRA INTERNATIONAL SCHOOL MOTHOROWALA DEHRADUN

सीमायें East - 0 West - 0  
North - 0 South - 0

कार्य का विवरण दे : मौके पर पूर्व निर्मित भवन में स्कूल का संचालन किया जा रहा है मौके पर कोई स्वीकृति नहीं दिखायी गयी।

का अनाधिकृत विकास कार्य / निर्माण कार्य प्रारम्भ कर दिया गया है / कर रहे हैं / पूरा कर लिया गया है। तथा जिसका विवरण निम्न प्रकार से हैं।

तथा जिसका किया जाना उपरोक्त अधिनियम की धारा 27 के अन्तर्गत दण्डनीय अपराध भी है। अतः उपरोक्त धारा 26 के अधीन अधिकारों पर प्रतिकूल प्रभाव पड़े बिना आपसे यह अपेक्षा की जाती है कि आप इस प्राधिकरण के अधि०अभि०/सचिव /उपाध्यक्ष कार्यालय में दिनांक Apr 10, 2024 पूर्वाह्न/अपराह्न (समय: 11:00 ) स्वयं अथवा अपने यथाविधि प्राधिकृत अपने यथाविधि प्राधिकृत अभिकर्ता द्वारा उपस्थित होकर कारण बतायें तथा आवश्यक सबूत पेश करे कि आप द्वारा किया गया उपरोक्त निर्माण को ध्वस्त कर देन या अन्य तरह से हटा देने के आदेश क्यों ना दिये जाएँ।

उपाध्यक्ष / सचिव / संयुक्त सचिव / सहायक अभियंता

नोट:-

- 1) आपका ध्यान उपरोक्त अधिनियम की धारा 26(9) की ओर दिलाया जाता है जिसके अधीन आप उपरोक्त कृत्य के लिए अर्थदंड के भागी भी हो सकते हैं जो 50000 (पचास हजार रुपये) तक हो सकता है और जारी रहने वाले अपराध की दशा में अतिरिक्त अर्थ दंड जो उस प्रत्येक दिन के लिए जिसके दौरान ऐसा अपराध उसके प्रथम बार दोष सिद्ध होने के पश्चात जारी रहता है 2500 (दो हजार पाच सौ रुपये) प्रतिदिन हो सकेगा के लिए दण्डनीय हो सकता है।
- 2) आपका ध्यान उक्त अधिनियम की धारा 26 (3) की ओर दिलाया जाता है जिसकी अधीन आप जैसे व्यक्ति जो उपरोक्त अधिनियम की धारा 25 के अधीन किसी भूमि या भवन में प्रवेश पाने को अधिकृत हैं, के प्रवेश में बाधा डालता है अथवा ऐसे प्रवेश के पश्चात ऐसे व्यक्ति को उत्पीड़ित करते हैं तो आप कारावास से जिसकी अवधि 6 माँस तक हो सकती है या जुरमाना रुपये 9000 (एक हजार) तक का हो सकता है अथवा दोनों के दंडनीय होंगे।
- 3) वादी सुनवाई में आने से पूर्व प्राधिकरण की वेब साईट <https://uhuda.uk.gov.in/easeapp/> पर अपना registration करना सुनिश्चित करें।

उक्त स्थल की अद्यतन फोटो भी आपको संलग्न कर भेजी जा रही है ।

Digitally signed by Shashank Saxena  
Date: 2024.04.05 14:20:07 +05:30  
Reason: Unauthorized Construction Notice  
Location: Dehradun

Page 1 of 1

सत्यापित प्रति

6-4-2024  
वाद लि./पेशकार  
म.दे.वि.प्रा., देहरादून

297  
ANNEXURE 10



Uttarakhand Housing & Urban Development Authority  
Department of Housing, Govt. of Uttarakhand  
Rajeev Gandhi Multipurpose Complex, Dispensary Road  
Dehradun - 248001 Telefax - 0135-2719500



MUSSOORIE DEHRADUN DEVELOPMENT AUTHORITY  
Transport Nagar, Saharanpur road, Near ISBT,  
Dehradun-248001 (Uttaranchal) INDIA  
GST No. 05AAAAM4651Q1ZA

		APPLICANT COPY	Date	: 22-04-2024
Reference No	: JV-002382/24-25	Office of the 200/- Mussoorie Dehradun Development Authority	Receipt No	: 00053/24-25
Name	: Piyush Kamboj	Received Rs. 22/04/2024	Purpose	: CASH ACCOUNTS
Income Head	: Misc. Certified Copy fees	Cashier	Mode Of Payment:	Cash
Description	: Amount Received for Certified Copy fees.	Date.....	Cheque Number	:
			Cheque Date	:
			Bank	:
Total (Rs)	: Rs. 200.00			
Amount In Words	: (Rupees. Two Hundred only)			

This is a computer generated receipt does not required any signature.

सेवा में,

श्रीमान् आदेशाली अधिकारी  
 मसूरी इंटरनल विकास प्राधिकरण  
 इंटरनल

विषय :- वाद संख्या UCM5/MDDA/C/0016/2024/276  
 में दुरु आदेश की प्रति लेन के संदर्भ में प्रपत्र

महोदय,

निवेदन इस प्रकार है कि MDDA टैक्स  
 द्वारा एक वाद संख्या - UCM5/MDDA/C/0016/2024/  
 27(1)  
 द्वारा किया हुआ है। प्राची को उपरोक्त वाद से  
 सम्बन्धित कार्यवाही अथवा आदेशों की प्रमाणीत  
 प्रति की आवश्यकता है। प्राची आवश्यक शुल्क  
 जमा करने को तैयार है।

अतः महोदय से निवेदन है कि  
 प्राची को उपरोक्त वाद में दुरु आदेश की  
 प्रमाणीत प्रति प्रदान करने की कृपा करें।

दि 22/04/2024

प्राची

लेखक/गार्ड

महोदय, उक्त वाद में शील आदेश (सीयूई काम्बोज)  
 को प्रत्याश्री/अपील चर्चा प्राची की कृपा से श्रीधरोवाला इंटरनल  
 2001- प्रमाणित प्रेष में जमा अथवा mob - 7500011172  
 दिया जा सके।

22/4/2024

## कार्यालय मसूरी देहरादून विकास प्राधिकरण देहरादून ।

(अनाधिकृत निर्माण/विकास कार्य को सील करने हेतु आदेश)

पत्रांक 162 /वाद संख्या सी-0016/एस-3/2024

दिनांक 20-4-24

प्रबन्धक,

सैरा इन्टरनेशनल स्कूल मौथरोवाला रोड  
देहरादून ।

विपक्षी प्रबन्धक, सैरा, इन्टरनेशनल स्कूल मौथरोवाला रोड देहरादून के द्वारा पूर्व निर्मित भवन में स्कूल का संचालन करने के कारण प्राधिकरण विकास क्षेत्र में उत्तराखण्ड (उत्तर प्रदेश योजना एवं विकास अधिनियम 1973)संशोधन अधिनियम 2009 की धारा 14 में निर्दिष्ट स्वीकृति से भिन्न उपयोग किया गया है। अनाधिकृत निर्माण के प्रत्यावेदन के आधार पर विपक्षी को उत्तराखण्ड नगर एवं ग्राम नियोजन तथा विकास अधिनियम की धारा 27(1) के अन्तर्गत दिनांक 5-4-2024 को कारण बताओ नोटिस जारी करते हुए वाद संख्या सी-0016/एस-3/2024 योजित किया गया। विपक्षी से अपेक्षा की गई कि दिनांक 10-4-2024 को प्राधिकरण कार्यालय में उपस्थित होकर अपना पक्ष प्रस्तुत करें। विपक्षी को सुनवाई हेतु दिनांक 10-4-2024 की तिथि नियत की गयी। उक्त तिथि पर विपक्षी उपस्थित हुए ओर विपक्षी द्वारा ओटीएस0 स्कीम के अन्तर्गत उक्त वाद को शमन कराने हेतु कहाँ गया। कार्यालय द्वारा पुनः दिनांक 16-4-2024 की तिथि नियत की गयी। उक्त तिथि पर विपक्षी उपस्थित नहीं हुए और न ही कोई प्रतिउत्तर दिया गया है। विपक्षी द्वारा ऑनलाईन शमन मानचित्र भी जमा नहीं किया गया है। विपक्षी को नोटिस भी पूर्ण तामिल है। इस से स्पष्ट होता है कि विपक्षी जानबुझकर लम्बित रखना चाहता है। उक्त वाद को लम्बित रखना न्याय हित में उचित नहीं है।

इस प्रकार स्पष्ट है कि आप द्वारा उत्तराखण्ड नगर एवं ग्राम नियोजन तथा विकास अधिनियम 1973 की धारा 14 में निर्दिष्ट स्वीकृति से भिन्न उपयोग किया जा रहा है। पत्रावली में उपलब्ध अभिलेखों के अवलोकन उपरान्त यह निष्कर्ष निकलता है कि उत्तराखण्ड प्रदेश (उ0प्र0 नगर योजना एवं विकास अधिनियम 1973)संशोधन अधिनियम 2009 की सुसंगत धाराओं कर उल्लंघन किया गया है। चालान शुद्धा निर्माण को सील किये जाने के अतिरिक्त कोई अन्य विकल्प शेष नहीं

सत्यापित प्रति

वाद लि./पेशकार  
म.दे.वि.प्रा., देहरादून

रह जाता है। पत्रावली पर उपलब्ध अभिलेखों के अध्ययन उपरान्त आपके अवैध निर्माण के विरुद्ध सीलिंग के आदेश पारित किया जाना ही विधि सम्मत है।

आदेश

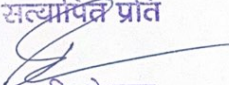
श्री प्रबन्धक, सैरा इन्टरनेशनल स्कूल मौथरोवाला रोड देहरादून के द्वारा स्थल पर पूर्व निर्मित भवन में स्कूल का संचालन करने करने के कारण प्राधिकरण विकास क्षेत्र में उत्तराखण्ड (उत्तर प्रदेश योजना एवं विकास अधिनियम 1973) संशोधन अधिनियम 2009 की धारा 14 में निर्दिष्ट सुसंगत धाराओं का उल्लंघन किये जाने के कारण प्रकरण में धारा 28क, के अन्तर्गत सील आदेश पारित किये जाते हैं। प्राधिकरण द्वारा उक्त चालान शुदा अवैध निर्माण को दिनांक ~~27-4-2024~~ को सील किया जाना है।

विपक्षी को आदेशित किया जाता है कि सील की तिथि से पूर्व उक्त सम्पूर्ण परिसर को खाली कर दें, तथा स्थल पर उपस्थित रह कर सील की कार्यवाही निष्पादित करायें। विपक्षी की अनुपस्थिति में सील की कार्यवाही एक तरफा सम्पादित हों, विपक्षी को यह भी निर्देश दिया जाता है कि स्थल पर कोई कार्य न करे एवं स्थल पर लगाई गयी सील को न तो क्षतिग्रस्त करें और न होने दें। क्योंकि उक्त कृत्य शासकीय कार्य में बाधा डालना एवं सरकारी सम्पत्ति को क्षति पहुंचाने के सम्मान है जो कि कानून दण्डनीय अपराध है। आदेश की एक प्रति स्थल पर चस्पा हो तथा एक प्रति विपक्षी को तामिल की जाये।

*aiidls*

अधिशाली अभि० / पीठासीन अधिकारी,  
मसूरी देहरादून विकास प्राधिकरण  
देहरादून।

सत्यापित प्रति

  
वैद लि./पेशकार  
म.दे.वि.प्रा., देहरादून

सूचना का अधिकार अधिनियम-2005

आवेदन पत्र

सेवा में,

लोक सूचना अधिकारी,  
मन्सूरी - ग्रामीण विकास प्रकल्प,  
देवरगढ़

महोदय,  
निवेदन है कि सूचना का अधिकार अधिनियम-2005 के प्रावधानों के अन्तर्गत मुझे निम्नलिखित सूचना की आवश्यकता है। कृपया वांछित सूचना उपलब्ध कराने का कष्ट करें-

1. आवेदक का नाम PETUSH KAMBOJ
2. पिता/पति का नाम RAVENDER KUMAR KAMBOJ
3. व्यवसाय SELF-EMPLOYED फोन नं० 7900446600
4. स्थायी पता MOHARAWA NR. PINDAN C/L PETROL PUMP,  
PO. No. 247001, UK
5. पता जहाँ पर सूचना देजी जायें:-

(क) नाम 11  
(ख) स-अ 11  
(ग) डफ्तर या पुलिस थाना 11 12  
(घ) जिला एवं राज्य

6. सूचना (जो मांगी गयी है) का विवरण: copy  
PLEASE PROVIDE THE BYELAW'S FOR THE APPROVAL OF  
PRIMARY SCHOOL BUILDING.

7. क्या आवेदक गरीबी रेखा के नीचे (बी.पी.एल.) की श्रेणी में आता है (यदि इस श्रेणी के अर्न्तगत है तो पुष्टि हेतु प्रमाण प्रस्तुत करें)
8. आवेदन के साथ संलग्न दस्तावेजों की सूची

दिनांक- 29/1/21

हस्ताक्षर,

29/1/21

(आवेदक का नाम)



सेवा में,

श्रीमान मुख्य शिक्षा अधिकारी  
मयूर विहार, सहस्त्रधारा रोड,  
जिला देहरादून।

विषय: अवैध रूप से संचालित सिएरा इन्टरनेशनल स्कूल, स्थित मोथरोवाला, देहरादून की  
जांच करवाने हेतु प्रार्थना पत्र।

महोदय,

निवेदन इस प्रकार है कि ग्राम मोथरोवाला में सिएरा इन्टरनेशनल स्कूल, स्थित मोथरोवाला, देहरादून को अंशुल काम्बोज एवं सिमला देवी द्वारा अवैध रूप से संचालित किया जा रहा है। उक्त सिएरा इन्टरनेशनल स्कूल द्वारा विद्यालय की मान्यता प्राप्त करने हेतु जो मानचित्र एवं अग्निशमन अधिकारी द्वारा प्रदत्त अनापत्ति प्रमाण पत्र स्कूल की मान्यता प्राप्त करने हेतु प्रदान किया गया है, वह ग्राम मोथरोवाला के भूमि स्थित खसरा नं० 1190, 1191क के लिये दिया गया है, जबकि स्कूल का संचालन अवैध रूप से आवासीय भूमि खसरा नं० '1081ख' स्थित मोथरोवाला, पर किया जा रहा है। अंशुल काम्बोज एवं सिमला देवी द्वारा मानकों के विपरीत जिस स्थान अर्थात् ग्राम मोथरोवाला स्थित खसरा नं० 1190, 1191क के लिये विद्यालय की मान्यता प्राप्त की है, उसके विपरीत स्कूल को अन्यत्र स्थान भूमि खसरा नं० 1081ख स्थित मोथरोवाला, में विधि विरुद्ध एवं मानकों के विपरीत अवैध रूप से संचालित किया जा रहा है, जिस कारण उक्त स्कूल में पढ़ने वाले बच्चों का भविष्य अंधकारमय बना हुआ है। अंशुल काम्बोज एवं सिमला देवी द्वारा सरकार/विभाग/प्राधिकरण द्वारा निर्धारित मापदण्डों का पालन किये बगैर अवैध रूप से उक्त स्कूल को संचालित किया जा रहा है।

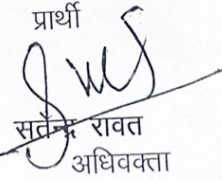
अतः महोदय से निवेदन है कि अवैध रूप से संचालित सिएरा इन्टरनेशनल स्कूल, स्थित मोथरोवाला, देहरादून की जांच कर उचित वैधानिक कार्यवाही करने की कृपा करें।

दिनांक 25.04.2024



1116

प्रार्थी



सतिश रावत  
अधिवक्ता

निकट शहीद स्मारक  
कोर्ट कम्पाउन्ड, देहरादून।  
मो० 9548881222



FIR No. \_\_\_\_\_ C. No. \_\_\_\_\_  
U/S \_\_\_\_\_  
P.S. \_\_\_\_\_

IN THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, DELHI

Suit / Appeal No. OA 134/2022, and 267/2022 JURISDICTION OF 201

In re:- NGT Bar Association Legal Aid Committee  
Plaintiff(s) or Petitioner(s)  
Appellant(s) Complainant(s)

VERSUS  
Madhu Kamboj Defendant(s) / Respondent(s) / Accused

KNOW ALL to whom these Present shall Come that I / We Madhu Kamboj

The above named Respondent do hereby appoint

Pooja Kalra and Sachin Dubey,  
Advocates

(herein after called the advocate/s) to be my / our Advocate in the above - noted case authorize him:-  
To act, appear and plead in the above-noted case in this court or in any other court in which the same may be tried or heard and also in the appellate court including High Court subject to payment of fees separately for each court by me / us.

To sign file, verify and present pleadings, appeals cross-objections or petitions for executions review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subjects to payment of fees for each stage.

To file and take back documents, to admit and/or deny the documents of opposite party.  
To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings on paying separate fee.  
To deposit, draw and receive money, cheques, cash and grant receipts hereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution on the said case.

To appoint and instruct any other Legal Practitioner authorising him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purpose.

And I/We undertake that I/We or my/our duly authorised agent would appear in court on all hearings and will inform the Advocate for appearance when the case is called.

And I/We undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the court shall be of the Advocate which he shall receive and retain for himself.

And I/We undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settle is only for the above case and above Court. I/We hereby agree that once the fee is paid, I / We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me / us on this \_\_\_\_\_ day of \_\_\_\_\_ 201

Accepted subject to the terms of the fees.

*S Dubey*  
Advocate

*Pooja Kalra*  
Advocate

*Madhu Kamboj*  
Client

Identify The Signature / Thumb Impression Of The Client  
Who has signed in my presence.