

BEFORE THE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

I.A. NO.45 OF 2025 (WZ)

IN

ORIGINAL APPLICATION NO. 100 OF 2024 (WZ)

Vanshakti & Anr.

... Applicants

Vs.

Municipal Corporation of Greater

Mumbai & Ors.

... Respondents

AFFIDAVIT IN REPLY OF RESPONDENT NO.12

I, Sumeet Singh aged about 35 years, Authorized Signatory of Respondent No. 12 having registered office at 7th Floor, Resham Bhavan, Veer Nariman Road, Churchgate - 400020, do hereby solemnly affirm and state as under:-

1. I have read and familiarized myself with the papers in the captioned Interim Application. I am conversant with the facts and circumstances of the present case and am able and competent to depose to the same on the basis of the records maintained by Respondent No. 12. I crave leave to file a further affidavit if so necessary.
2. I am filing the present limited affidavit in reply to this Interlocutory Application for the limited purpose of opposing the amendment to the Original Application. I am therefore advised that I am not required to deal with the allegations made and contentions raised in the proposed amendment and reserve the right to deal with the same if this Hon'ble Tribunal permits the proposed amendment or any part thereof.
3. At the outset I repeat and reiterate what is stated in my Affidavit in Reply dated February 13, 2025 in Original Application No. 100 of 2024 ("**Original Application**") and Affidavit in Reply dated March 10, 2025 in I.A. No. 44 of 2025 ("**Interim Application**") before this Hon'ble Tribunal

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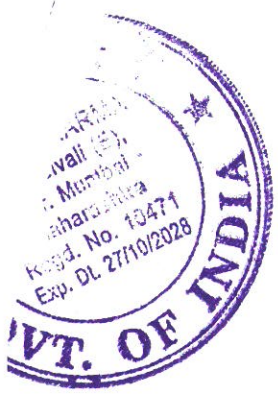




and deny each and every allegation, contention and insinuation which is contrary to and / or inconsistent with what is set out therein and herein. Nothing contained herein is or should be deemed to be admitted by Respondent No. 12 for want of specific traverse or otherwise.

4. At the further outset, I submit that the present amendment application is nothing but a tactic to introduce new facts and circumvent the issue that the Original Application is barred by limitation and ought not to be entertained by this Hon'ble Tribunal. Additionally, the Applicant has no locus to maintain the Original Application. Apart from making a bald statement that it is "*aggrieved by environmental destruction in the Dindoshi hills region*", the Original Application does not disclose how the Applicant is covered by Section 18(2) of the National Green Tribunals Act, 2010.
5. I say and submit that the Applicants state that the Original Application requires amendments allegedly *inter alia* for the following reasons:
 - a. To incorporate the recommendations stated in the Joint Committee Report dated May 10, 2024 ("**Joint Committee Report**");
 - b. It was observed in the last hearing i.e. on December 4, 2024 that the Original Application should be amended to include prayers for the implementation of the recommendations of the Joint Committee; and
 - c. Implead the Dindoshi Police Station to diligently investigate fires that occurred on December 28, 2024 and January 13, 2025.
6. I repeat and reiterate what is stated in my Reply dated March 10, 2025 filed in Interim Application that the alleged fires that occurred on December 28, 2024 and January 13, 2025 have not been caused by Respondent No. 12 or its agents or representatives.
7. I say and submit that the vide the Order dated December 4, 2024 this Hon'ble Tribunal *inter alia* directed the Applicants to:
 - a. Amend the memo of parties to implead this Respondent No. 12; and
 - b. To clearly frame issues to assist this Tribunal.







This Hon'ble Tribunal did not observe or direct the Applicants to incorporate the Joint Committee Report Recommendation in the Original Application. It is pertinent note that whilst the Applicant promptly impleaded Respondent No.12, it is reluctant to frame issues. It is obvious that the Applicant is only interested in prolonging these proceedings. The present Application is also a step in that direction, which seeks to unnecessarily widen the scope of the Original Application and implead party which is neither a necessary nor a proper party to the Original Application i.e. the Dindoshi Police Station.

8. In any event without prejudice to the above and as stated in my Reply dated February 13, 2025 filed in Original Application, the Joint Committee Report has gone beyond the scope of the Order dated May 10, 2024 passed by the Hon'ble Tribunal.
9. I submit that the recommendation need not be incorporated in the Original Application and are present before this Hon'ble Tribunal for its consideration.
10. I submit that the Order of the Hon'ble High Court dated January 14, 2025, in PIL No. 48 of 2023 and Contempt Petition (L) 9237 of 2023 applies only to the parties to PIL No. 48 of 2023 and land therein. Further the Zonal Master Plan is being prepared and the same can be looked into once it is published / provided, and there need not be any further directions to expedite the same passed by this Hon'ble Tribunal.
11. In the aforesaid circumstances, the present Interlocutory Application deserves to be dismissed with costs.

Solemnly declared at Mumbai)

This 18th day of March 2025)


(Sumeet Singh)
Before me, 

DSK Legal



Advocates for Respondent No.12.

VERIFICATION

I, Mr. Sumeet Singh, the Respondent No.12 abovenamed having my office at 7th Floor, Resham Bhavan, Veer Nariman Road, Churchgate, Mumbai – 400020, do hereby solemnly affirm and state that what is stated herein in the affidavit is based on the information derived from the records of the company which I believe to be true.

Solemnly declared at Mumbai)

Dated | 8th this day of March 2025)

S.S.S.
(Sumeet Singh)
Before me,

DSK Legal

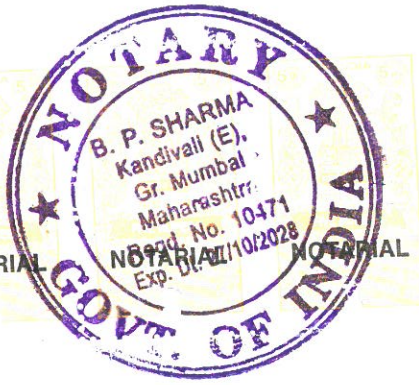
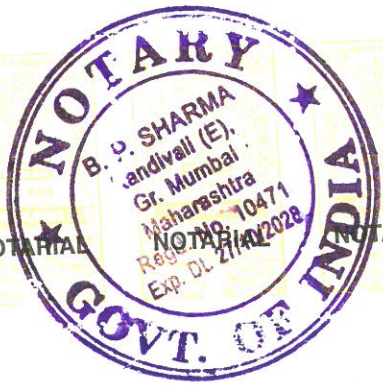
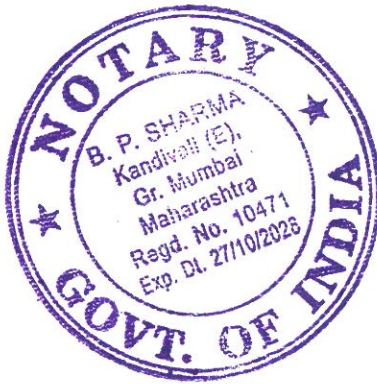
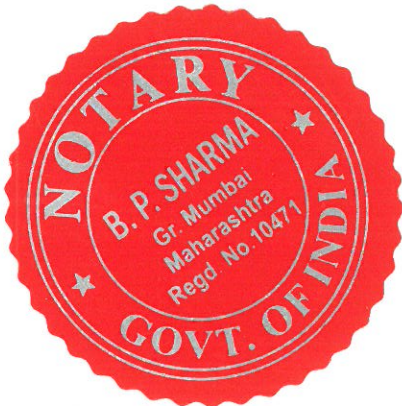
Shakkar

Advocate for Respondent No.12.

BEFORE ME

B. Sharma
B. P SHARMA
B.Sc., LLB
NOTARY
MAHARASHTRA
(GOVT. OF INDIA)
Reg. No. 10471

Notarial Serial. No 1195/2025
Dated 18 MAR 2025



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(WZ)

Vanshakti & Ors. ... Applicants

Versus

Municipal Corporation of Greater Mumbai
& Ors. ... Respondents



**AFFIDAVIT IN REPLY OF RESPONDENT
NO.12 TO INTERLOCUTORY APPLICATION**

Dated this 18th day of March, 2025

DSK Legal

Advocates for Respondent No.12
C- 16, C Block Dhanraj Mahal
3rd Floor, Chhatrapati Shivaji Marg
Apollo Bunder,
Mumbai 400 001