



BEFORE THE NATIONAL GREEN TRIBUNAL,
WESTERN ZONE BENCH, PUNE

Appeal No. 337 of 2025(WZ)

M/s. Prabhu's Violetta Phase-I ... Appellant

v/s

Goa State Pollution Control Board
and anr. ... Respondents

AFFIDAVIT IN REPLY OF THE RESPONDENT NO. 02 TO
BOTH, THE MEMO OF APPEAL AS ALSO THE
APPLICATION FOR STAY FILED BY THE
APPELLANT/APPLICANT

Recd
30/3/26

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I, Shri Kapil Naik, aged around 45 years, son of Devidas Y. Naik, Indian National, the Secretary of the Respondent No. 02 Panchayat and having my office at the Village Panchayat of Chicalim, Mormugao, Goa. 403711 do on solemn affirmation state as under:-

1. I say that I have perused the memo of appeal along with the annexures thereto and the application for stay filed by the Appellant/Applicant before this Hon'ble Tribunal and I am thus filing a common reply to both.
2. I say that the Respondent No. 02 as a Panchayat having jurisdiction over the area which is the subject matter of the appeal before this Hon'ble Tribunal based on the complaint of a local villager Shri Orlando Silveira dated 02/07/2024 [Annexure –M (colly) at page 120] complaining of leaving of unhygienic sewerage water in the drain only for the flow of rain water which was leading to pollution and bad smell leading to facing of health problems, issued a joint site inspection notice dated 03/07/2024 [Annexure –M (colly) at page 119] in which the Respondent No. 01 was requested



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to depute their representative/official to verify the facts on sanitary point of view and submit their report.

3. I say that the said notice for a joint site inspection was issued to the Respondent No. 01 as the Respondent No. 01 was competent to verify the allegations made in the said complaint while the Respondent No. 02 was not competent on account of having no scientific infrastructure to verify the contents of the said complaint.

4. I say that the Respondent No. 01 having now passed the impugned order of which the said complaint and the joint site inspection held pursuant to the joint site inspection notice issued by the Respondent No. 02 to the Respondent No. 01, forms the basis for the passing of the impugned order which is challenged before this Hon'ble Tribunal, the Respondent No. 02 shall comply with all the directions/orders as and when issued both by the Respondent No. 01 and this Hon'ble Tribunal to the Respondent No. 02.



Quate

5. I say that I leave it to this Hon'ble Tribunal whether the prayers as sought for by the Appellant/Applicant in the present proceeding ought to be granted or not.

6. I say that whatever I have mentioned above at paragraphs 02 and 03 is based on records and whatever is mentioned at paragraphs 01 and 04 is true to my own knowledge.

Solemnly affirmed at Vasco da Gama, Goa, this 27th day of March 2026.



Quate
Deponent
Secretary
V. P. Chicalim
Bornmugao Goa

Identified by me,

Goa
de
(Shri Zeller C. de Sousa)
Advocate

Solemnly affirmed before me by
Kapil Naulik

who is identified to me by
Adv. Zeller C. de Sousa

whom I personally know



ju
Adv. Surajkumar N. Nalk
NOTARY
STATE OF GOA

36, Ground Floor, Apara Bazar, Bldg.
VASCO-DA-GAMA, GOA - 403 802

Date : 27/03/2026
5597/2026

VAKALATNAMA

IN THE Before the National Green Tribunal
Western Zone Bench, Pune.

Appears. 337 / 2025 (WZ)

M/S. Prabhu
Vidyalā; Phad-1;

Petitioner/Applicant/Plaintiff/
Complainant/Intervenor/Caveator

v/s

Coastal Protection
Control Board & Co.

Respondent/Defendant/Accused

I/We Shri Kapi Datta

being officer
resident of

the office of the Inspector of the
of the respondent no. 02 above,

engage, appoint and retain **Shri Zeller C. de Souza,**
B.A, LL.M. (MAH. 1649/1992) and **Miss Zyreanne de**
Souza, B.A. LL.B. (MAH. 13908/2024), Advocates having office

at "B" Block, Maria Luiza Plaza, Comba, Margao, Goa.
Mobile No. 9822181145 as my/our advocates in the
aforementioned matter. **Email id:** zellercruz@gmail.com

Signed this 01st day of October 2025



Quate
Secretary
V. P. Chicalim
Mormugao Goa

Accepted by us,

[Signature]
(Shri Zeller C. de Souza) B.A, LL.M.

[Signature]
(Miss Zyreanne de Souza) B.A. LL.B.

Filed in the Court on: _____