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BEFORE THE NATIONAL GREEN TRIBUNAL SITTING AT PUNE

MEMORANDUM OF APPLICATON

(Under Section 15 read with Section 18 of The National Green Tribunal Act, 2010)

APPLICATION NO. OA /34 OF 2023 /WZ

IN THE MATTER OF:-

Sandeep Parkar & Another **...Applicant**

Versus

Member-Secretary, State Level Environment Impact & Others **...Respondents**

AFFIDAVIT IN REPLY OF THE RESPONDENT NO. 5

I, Vijay More, being an adult, Indian inhabitant and authorised signatory of Skylark Buildcon Private Limited i.e. Respondent No.5, having office at 54-B, 402, Sagar Avenue, 5th Floor, Junction of SV Road, Lallubhai Park Road, Andheri (W), Mumbai 400 058, do hereby solemnly affirm and state as follows:

1. I say that I am the authorized representative of Respondent No. 5. I am conversant with the facts and circumstances of the present case, and therefore competent to depose thereto.

2. I say that I am filing this Affidavit for the limited purpose of challenging the maintainability of the captioned Application and also opposing grant of any interim / ad-interim relief.

SHANE CARDOZA ADVOCATE & NOTARY MUMBAI MAHARASHTRA REG. No. 16389 EXPIRE ON 27th JAN 2025

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3. At the outset, I deny all the allegations, contentions and insinuations made in the captioned Application which are contrary and / or inconsistent with all that is state herein. I say that nothing contained in the captioned Application should be deemed to be admitted by this Respondent for want of specific traverse or otherwise. I crave leave to file detailed Affidavit / Additional Affidavits / Written Submissions in the captioned Application dealing in detail with the contents of the captioned Application, as and when necessary.

4. I say that the captioned Application is not maintainable and deserves to be dismissed, inter alia, on the following grounds, each of which are in the alternative and without prejudice to each other:

4.1. **The purported violations of the Maharashtra (Urban Areas) Protection and Preservation of Trees Act, 1975 are beyond the scope of the purview of this Hon'ble Tribunal**

4.1.1. A perusal of the captioned Application and the prayers sought therein makes it amply clear that the same is premised upon Respondent No. 5's purported failure to abide by provisions of the Maharashtra (Urban Areas) Protection and Preservation of Trees Act, 1975 ("**Trees Act**").

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4.1.2. The Applicants have, in paragraph 2.15 of the captioned Application stated as follows:

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"*Accordingly, the Original Application is being filed seeking resolution to the "substantial questions relating to environment*" as specified in the foregoing, on such specific grounds, which, with adequate evidence, are detailed hereunder:"

4.1.3. Admittedly, the Applicants have sought to seek resolution of 'substantial questions relating to environment'. Sections 14 of the National Green Tribunal Act, 2010 ("**NGT Act**") provides that this Hon'ble Tribunal shall have jurisdiction over civil cases where a 'substantial question relating to the environment is involved and such question arises out of the implementation of the enactments specified in Schedule I of the NGT Act.

4.1.4. Schedule I of the NGT Act provides as follows:

"Schedule I

1. *The Water (Prevention and Control of Pollution) Act, 1974;*
2. *The Water (Prevention and Control of Pollution) Cess Act, 1977;*
3. *The Forest (Conservation) Act, 1980;*
4. *The Air (Prevention and Control of Pollution) Act, 1981;*
5. *The Environment (Protection) Act, 1986;*
6. *The Public Liability Insurance Act, 1991;*
7. *The Biological Diversity Act, 2002."*

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4.1.5. A bare perusal of the aforesaid makes it clear that the Trees Act is not included in Schedule I of the NGT Act and as such

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assuming without admitting that the captioned Application raises 'substantial question relating to environment', the same cannot be entertained as the questions raised do not arise out of the implementation of the enactments specified in Schedule I.

4.1.6. In view of the aforesaid, it is respectfully submitted that this Hon'ble Tribunal does not have the jurisdiction to entertain and adjudicate upon the captioned Application. Therefore, the captioned Application deserves to be dismissed.

4.2. **Original Application is barred by Limitation.**

4.2.1. Without prejudice to the fact that Respondent No. 5 has duly complied with the provisions of the Tree Act. It is submitted that this Hon'ble Tribunal ought not to entertain the captioned Application and the same deserves to be dismissed at the very threshold as the same is barred by limitation as prescribed under the NGT Act.

4.2.2. In the present case the Applicants have, made following averments in the captioned Application:

(i) Paragraph 2.15 of the captioned Application stated as follows:

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"*Accordingly, the Original Application is being filed seeking resolution to the "substantial questions relating to environment*" as specified in the foregoing, on such specific grounds, which, with adequate evidence, are detailed hereunder:"

(ii) The Applicants have in paragraph 1.7 of the captioned Application setout the purported *"substantial questions relating to environment*".

4.2.3. The issued in relation to the adjudication of *"substantial questions relating to environment*" are governed by the provisions of Section 14 of the NGT Act. Section 14 of the NGT Act are as follows:

"Section 14

(1) The Tribunal shall have the jurisdiction over all civil cases where a substantial question relating to environment (including enforcement of any legal right relating to environment), is involved and such question arises out of the implementation of the enactments specified in Schedule I.

(2) The Tribunal shall hear the disputes arising from the questions referred to in sub-section (1) and settle such disputes and pass order thereon.

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(3) No application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute first arose:

Provided that the Tribunal may, if it is satisfied that the applicant was prevented by sufficient cause from filing the application within the said period, allow it to be filed within a further period not exceeding sixty days.

On a perusal of Section 14 of the NGT Act, an application raising substantial queries relating to the environment has to be filed within a period of 'six months from the date on which the cause of action for such dispute first arose, provided that this Hon'ble Tribunal may, if it is satisfied that the Applicants were prevented by sufficient cause from filing the Application allow it to be filed within a further period not exceeding sixty days.

4.2.4. Further, a perusal of the captioned Application makes it clear that the Applicants claims to be aggrieved by the issuance of occupation certificate in respect of the buildings in the Sai Sundar Nagar Scheme, the occupation certificate for the first building in the Sai Sundar Nagar Scheme was issued by the Slum Rehabilitation Authority on 29th July, 2010. Therefore, the cause of action to file the captioned Application first arose on 29th July, 2010. The captioned Application being filed after approximately 13 years from date of issuance of the

occupation certificate is hopelessly barred by limitation and therefore ought to be dismissed. Assuming without admitting, that the Applicants are only aggrieved by the issuance of the one of the latest Occupation Certificate dated 29th June, 2022 with respect to one of the buildings granted by the Slum Rehabilitation Authority even then, the period of six months expired on 29th December, 2022. Further, the additional period of 60 days also expired on 27th February, 2023. However, the captioned Application has been filed on 16th March, 2023. The provisions of the NGT Act are clear and unambiguous and as such the captioned Application should not be entertained as it is not within the period stipulated therein. In view of the aforesaid, the captioned Application deserves to be dismissed at the threshold.

4.2.5. It is submitted that the Applicants are aware of the aforesaid bar and as such have sought to allege that the cause of action is continuing. However, the provisions of the NGT Act are extremely clear and the word used are 'when the cause of action first arose' and thus the contention that the cause of action is continuing is bad in law and cannot be countenanced.

4.2.6. Admittedly, the Applicants are residents of the layout and are therefore aware of the progress of the Sai Sundar Nagar Scheme from time to time, as such cannot claim to be unaware of the occupation certificates granted from time to time.

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4.2.7. It is submitted that there exists a bar if the Application is not within the prescribed limitation which is further extendable for a period not exceeding 60 days and the same cannot be entertained thereafter.

4.2.8. Though the Applicants have claimed to file the captioned Application under Section 15 of the NGT Act. From a plain reading of the captioned Application it is clear that no averments have been made setting out the applicability of the provisions of Section 15 of the NGT Act, except a single mention of Section 15 of the NGT Act in the cause title. Without prejudice the fact that no case is made out by the Applicants in the captioned Application, I say and submit that the Applicants cannot claim benefit of a provision without making necessary averments in respect of the same in the Application. Hence, there cannot be applicability of the provisions of Section 15 of the NGT Act. I say that on this ground alone the captioned Application ought to be dismissed in limine.

4.2.9. In view of the aforesaid, the captioned Application deserves to be dismissed at the threshold as barred by limitation.

4.3. **<u>The Applicants are guilty of suppresio veri and suggestion falsi.</u>**

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4.3.1. At the outset, I say that the Applicants are slum dwellers located on the land which forms subject matter of the

captioned Application. I say that the Applicants have been rehabilitated in the rehab buildings constructed by Respondent No. 5. I say that the Applicants have suppressed that occupation certificates with respect to several rehab buildings have also been issued from time to time. I say that the conduct of the Applicants makes it clear that the same is an attempt to arm-twist Respondent No. 5 and as such the captioned Application deserves to be dismissed.

4.3.2. I say that the Applicants have conveniently failed to take into account and make averments with respect to grant of occupation certificate of the rehab buildings and claim to be aggrieved only by the grant of occupation certificate of the sale building. This clearly proves that the captioned Application is motivated and filed with the malafide intention of arm-twisting the Respondent No. 5.

4.3.3. The Applicants have for the purposes of sensationalizing the matter and misleading this Hon'ble Tribunal resorted to making false and misleading claims. The Applicants have for the aforesaid purpose also resorted to making contradictory claims.

4.3.4. The Applicants have at paragraph 2.4 of the captioned Application stated that the Project cost is Rs. 500,00,00,000/- (Rupees Five Hundred Crore only) however, at paragraph 3.5 of the captioned Application where they purport to calculate the alleged profits of Respondent No. 5, the Applicants have

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(to inflate the purported profit) reduced the purported project costs to Rs. 250,00,00,000/- (Rupees Two Hundred and Fifty Crore only). Therefore, the Applicants have themselves taken contradictory stands in the captioned Application.

4.3.5. The Applicants have also sought to prejudice this Hon'ble Tribunal by giving cooked up details of the project cost and the revenue of the Project. I say that the same are baseless and without any merit. I crave leave of this Hon'ble Tribunal to produce the relevant details as and when required.

4.3.6. The Applicants have without any basis, on their own volition and merely to arm-twist Respondent No. 5 ascertained that area of the land required for planting 1 tree is 25 square meters. The Applicants have failed to state any basis for the same.

4.3.7. The Environmental Clearance dated 28th January, 2016 ("**2016 EC**") issued by the State Level Environment Impact Assessment Authority clearly provides that 4770 rehab tenements (including 4502- rehab flats, 141 rehab shops, and 127 welfare centre, balwadi centre and society offices). However, the Applicants (despite annexing the 2016 EC) have, with ulterior motive and to mislead this Hon'ble Tribunal, stated that only 2300 tenements have to be constructed for rehabilitation of slum dwellers.

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4.3.8. The Applicants have solely to mislead this Hon'ble Tribunal and have without any basis stated that the revenue of the project is Rs. 24330,00,00,000/- (Rupees Twenty Four Thousand Three Hundred and Thirty Crore only). I say that the same has no factual basis and has been averred only to sensationalize the filing of the captioned Application and earn publicity at the expense of the good will of Respondent No. 5.

4.3.9. I say that the aforesaid makes it amply clear that the Applicants have approached this Hon'ble Tribunal with unclean hands and have sought to mislead this Hon'ble Tribunal. As such, the captioned Application deserves to be dismissed at the threshold.

4.3.10. Respondent No. 5 along with Shree Vrunda Enterprises Private Limited earlier known as M/s. Shree Vrunda Enterprises) ("**Shree Vrunda**") is undertaking development of various portions of slum in or around Sai Sundar Nagar, Worli ("**Sai Sundar Nagar Scheme**") and other slum rehabilitation scheme which are clubbed with Sai Sundar Nagar Scheme.

4.3.11. It is pertinent to note that the present development is a slum rehabilitation scheme having multiple phases and with additional acquisition of lands for scheme to rehabilitate the slum dwellers thereon as well. This is clear from the

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following table showing additions in the slum schemes areas from time to time:

Sr. No.	Letters of Intent	Total Area (in square meters)
1.	Letter of Intent dated 25th August, 2009.	34857.47
2.	Letter of Intent dated 21st December, 2010.	38857.50
3.	Letter of Intent dated 3rd May, 2014.	48777.06
4.	Letter of Intent dated 10th November, 2016.	65313.01
5.	Letter of Intent dated 15th March, 2017.	65313.01
6.	Letter of Intent dated 27th October, 2020.	66748.16

I crave leave to refer to and rely upon the approvals and permissions issued by the competent authorities from time to time as and when produced.

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4.3.12. The Sai Sundar Nagar Scheme is being undertaken in phases. As Respondent No. 5 is undertaking the development of the Sai Sundar Nagar Scheme in a phase-wise manner, Respondent No. 5 is in the process of completing the first phase of the Sai Sundar Nagar Scheme. Accordingly, the Respondent No. 5 has made an Application dated 5th June, 2023 to the Respondent No. 3 setting out the details of the trees which are planted by Respondent No. 5 from time to time as part of the first phase of the Sai Sundar Nagar Scheme and issuance of the part tree completion in respect of the first phase of the Sai Sundar Nagar Scheme ("**the said Application**") and the Respondent No. 5 is awaiting the part tree completion certificate pursuant to the said Application. A copy of the said Application is annexed hereto and marked as **Exhibit "A"**. Copies of the photographs evidencing the plantation of the entire 206 trees are annexed hereto and marked as **Exhibit "B"**.

4.3.13. I say that the filing of the said Application has rendered the captioned Application infructuous as Respondent No. 3 who is the competent authority (which can duly decide the number of trees to be planted by Respondent No. 5 and duly verify Respondent No. 5's compliance of the same) is seized of the matter and will decide the said Application on merits and as such this Hon'ble Tribunal need not entertain the captioned Application.

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4.3.14. I say a bare perusal of the 2016 EC (specifically point 8 @ page 40 of the captioned Application) makes it amply clear that Green Belt Development on 'RG' i.e. recreational ground was contemplated. I say that from time to time the planning authority publishes a development plan for the city of Mumbai. In the development plan sanctioned for the city of Mumbai certain portions are reserved for Recreational Ground. As per the 2016 EC, an identified area of approximately 8,000 square meters was reserved for Recreational Ground. On account of the aforesaid reservation, an identified area of approximately 8,000 square meters was agreed to developed as a green belt in the 2016 EC. As stated above, the Sai Sundar Nagar Scheme is being developed in a phase wise manner. The aforesaid area of 8,000 square meters being an identified land reserved for Recreation Ground is still encroached by slum dwellers and will be developed in the further phases in accordance with applicable law. I repeat and reiterate that the Sai Sundar Nagar Scheme is an ongoing scheme and the aforesaid reserved area of the Recreation Ground forming part of the future phase can be developed only after clearance of the slums thereon, the question of not giving allotment of the premises in the present phase does not arise. In this regard, I crave leave to file a detailed affidavit in relation to the allegation made in the captioned application as and when necessary.

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5. In view of what is stated hereinabove, the captioned Application be dismissed in limine.

Solemnly affirmed at Mumbai)
This day of July, 2023)

3 JUL 2023

Before me,

For Wadia Ghandy & Co.

Partner
Advocates for Respondent No.5

BEFORE ME
SHANE CARDOZ
Advocate & Notary (Govt. of India)
Reg. No. 16388 B'Com L.L.B
53, Clifford House, Kadeshwari Mandir Road
Next to Ganesh Mandir Chowk Bandra (W)
Mumbai - 400 050 Mob : 98205 17

SHANE CARDOZ ★ GOVT. OF INDIA ★ ADVOCATE & NOTARY ★ MUMBAI MAHARASHTRA REGN. NO. 16388

Notary Register Serial No.	2813/23
Date: 3 JUL 2023	

ORIGINAL SEEN & VERIFIED

Aadhaar	ELECTION ID	DRNG. LICENSE	PASSPORT	POA	RESOLUTION
6836 4955 8910					

SHANE CARDOZ ★ GOVT. OF INDIA ★ ADVOCATE & NOTARY ★ MUMBAI MAHARASHTRA REG. NO. 16388 EXPIRE ON 27th JAN 2025

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EXHI 133 "A"

SANJAY NEVE & ASSOCIATES

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Date: 05/06/2023

To,
Dy. Superintendent of Garden,
Zone–II, Garden Department,
'E' Ward, Byculla, Mumbai.

Sub: Application for Part Completion of Tree NOC for proposed S. R. Scheme of Sai Sunder Nagar CHS Ltd. & other Societies on plot bearing F. P. No. 1076, 1077, 1078 of TPS - IV of Mahim Division, C. S. No. 286 (pt.) & 912 of Lower Parel Division and clubbed scheme of Gomata Nagar CHS Ltd. on plot bearing C. S. No. 438 & 1/268 of Lower Parel Division & Nehru Nagar CHS ltd. on C. S. No. 268 (pt.), 286 (pt.), 437 (pt.) of Lower Parel Division and with amalgamation of proposed S. R. Scheme of Balkrishna Gawade CHS Ltd. on plot bearing C. S. No. 912 & C. S. No. 286 (pt.) with proposed S. R. Scheme of Mubadeveli Prabhadevi CHS (Prop.) & 7 other Societies on plot bearing C. S. No. 911 & 2A/911 of Lower Parel Division, in G/S Ward.

Ref: DYSG/TA/ML/1210 dated 30/11/2009.

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Dear Sir,

With reference to the above mentioned property, we are requesting for tree final NOC, earlier we obtained tree cutting and transplanting NOC as per mentioned above. The copy of the same is attached herewith. The tree requirements are calculated in following table:

Plantation of tree with respect to plot area:

Sr. No.	Description	Area in Sq.Mts.	Remarks	
1)	Plot area	25831.57	---	
2)	Plinth area	16178.30	Sale Building	9853.07 Sq.Mts.
			Rehab Building No. 1	453.43 Sq.Mts.
			Rehab Building No. 2	447.32 Sq.Mts.
			Rehab Building No. 3	441.88 Sq.Mts.
			Rehab Building No. 4	665.45 Sq.Mts.
			Rehab Building No. 5	387.20 Sq.Mts.
			Rehab Building No. 6	434.03 Sq.Mts.
			Rehab Building No. 7	335.64 Sq.Mts.
			Rehab Building No. 8	406.02 Sq.Mts.
			Rehab Building No. 9	485.50 Sq.Mts.
			Rehab Building No. 10	406.02 Sq.Mts.
			Rehab Building No. 11	357.83 Sq.Mts.
			Rehab Building No. 12	357.83 Sq.Mts.
			Rehab Building No. 13	273.88 Sq.Mts.
			Rehab Building No. 14	462.15 Sq.Mts.
			Receiving Station	322.05 Sq.Mts.
			U. G. Tank	89.00 Sq.Mts.
3)	Area under Internal Road	564.88	---	

302, Oomkareswar, Linking Road, Behind Kanderpada Talav, Dahisar (West), Mumbai - 400 068.
Fax : 022-28956052 Office : 022-28903656 Mob. : 09821025966 • Email : arch.neve@gmail.com

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SANJAY NEVE & ASSOCIATES

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4)	Paved R.G.	2454.52	---
5)	Balance open space	6633.87	6633.87/100 x 2 = 132.68 Say 133.
6)	Total tree plant		**133 Nos.**

Plantation of trees with respect to cutting of trees:

Sr. No.	Description	Calculation of trees
1)	Total trees allowed to cutting as per permission	19 Nos.
2)	Trees to be planted as per cut trees (19 nos. X 2)	38 Nos.
3)	Total trees to be planted	**38 Nos.**

Now my client has planted **206** Nos. of trees as per Norms of Tree Authority. We enclosed the photographs of the same for your kind consideration please.

You are requested to grant us Part Tree Completion as early as possible.

Thanking you,

Yours faithfully,

S. NEVE.
Architect.

SHANE CARDOZ ★ ADVOCATE & NOTARY ★ GOVT. OF INDIA ★ MUMBAI MAHARASHTRA REG. No. 16888 EXPIRE ON 27th JAN 2025

Encl:

1. CC Copy of All Building.
2. Photographs of newly planted trees.
3. Old tree permissions.
4. Appointment letter of Architect.

उप उद्यान अधीक्षक (शहरे)
'ई' विभाग
- 5 JUN 2023
क्रमांक :.....

TRUE COPY

Partner
Wadia Ghandy & Co.
Advocates, Solicitors & Notaries
N. M. Wadia Building,
123, Mahatma Gandhi Rd.
Fort, Mumbai - 400 023.

302, Oomkareswar, Linking Road, Behind Kanderpada Talav, Dahisar (West), Mumbai - 400 068.
Fax : 022 - 28956052 Office : 022 - 28903656 Mob. : 09821025966 • Email : arch.neve@gmail.com

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EXHIBIT-"B"

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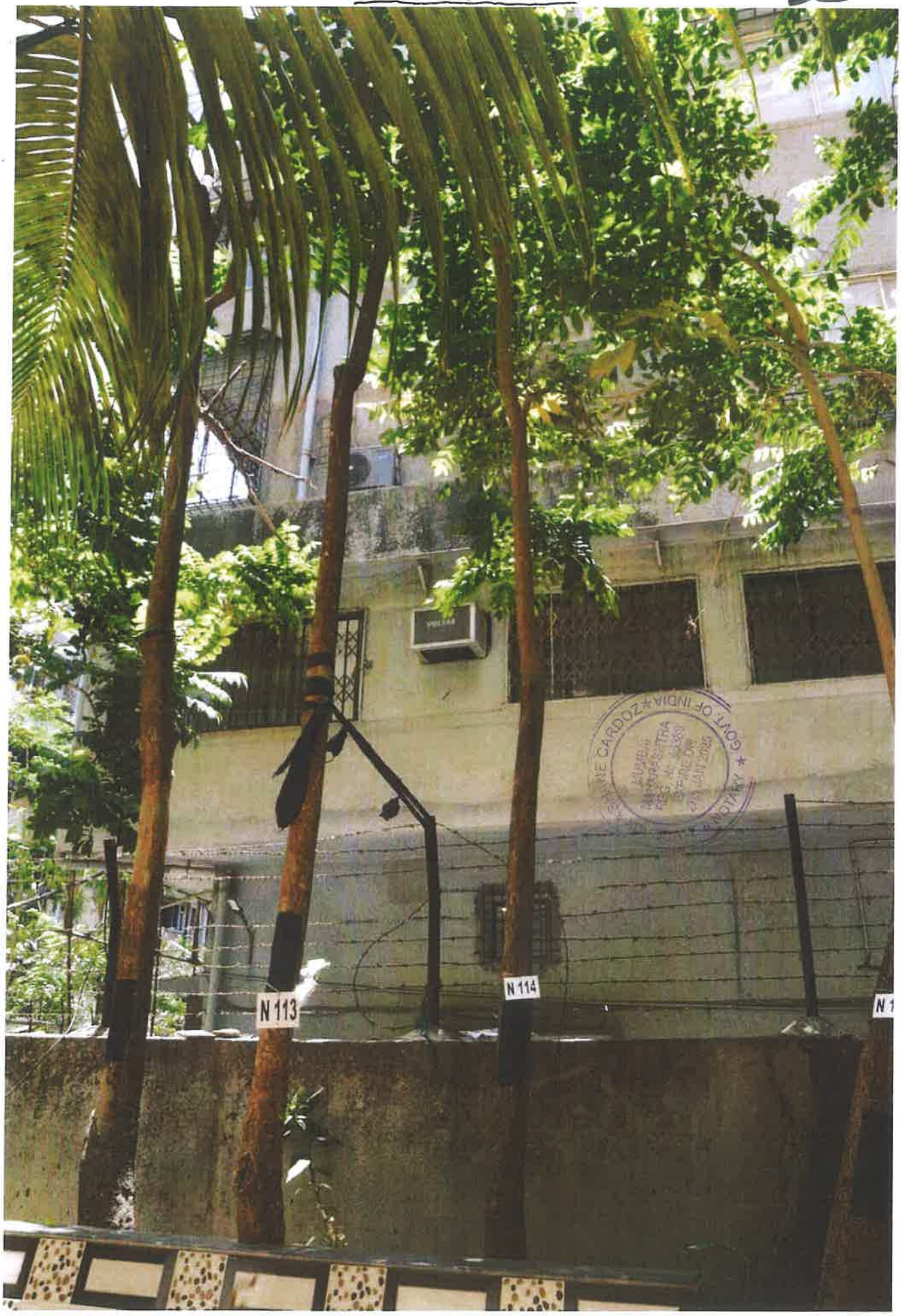

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GOVT. OF INDIA
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MUMBAI
MAHARASHTRA
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ADVOCATE & NOTARY

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SHAANE CARDOZ ★ ADVOCATE & NOTARY ★
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MAHARASHTRA
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SHAHANE CARDOZ ★ GOVT. OF INDIA ★
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REG. No. 16388
EXPIRE ON
27th JAN 2025
★ ADVOCATE & NOTARY ★

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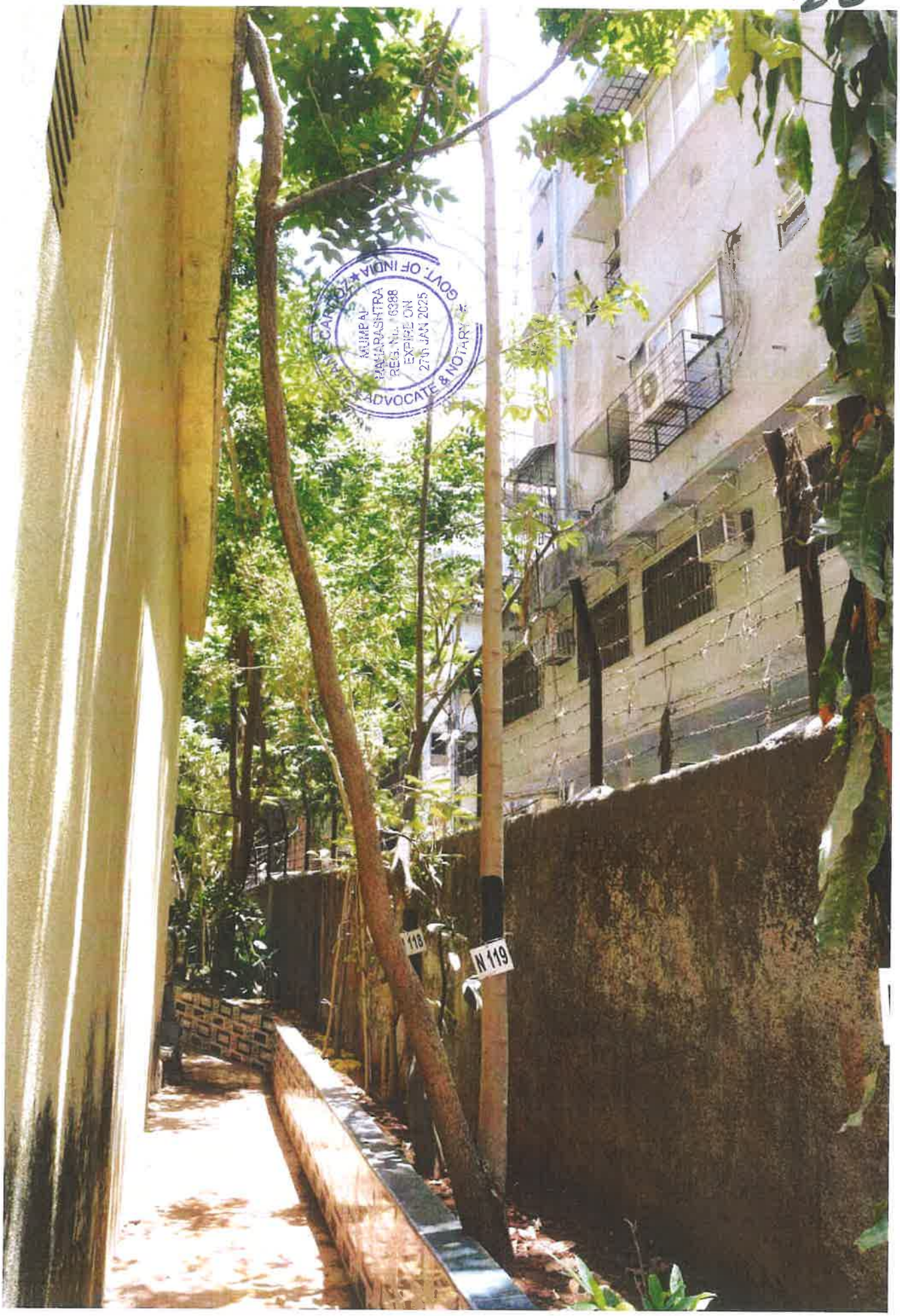
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MUMBAI
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REG. No. 6388
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ADVOCATE & NOTARY

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SHANE CARDOZ ★ GOVT. OF INDIA ★ ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 15588
EXPIRY ON
24-04-2025

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N 122
N 123
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No.
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

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N 122
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SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
MAHARASHTRA
REG. No. 10588
EXPIRE ON
27th JAN 2025

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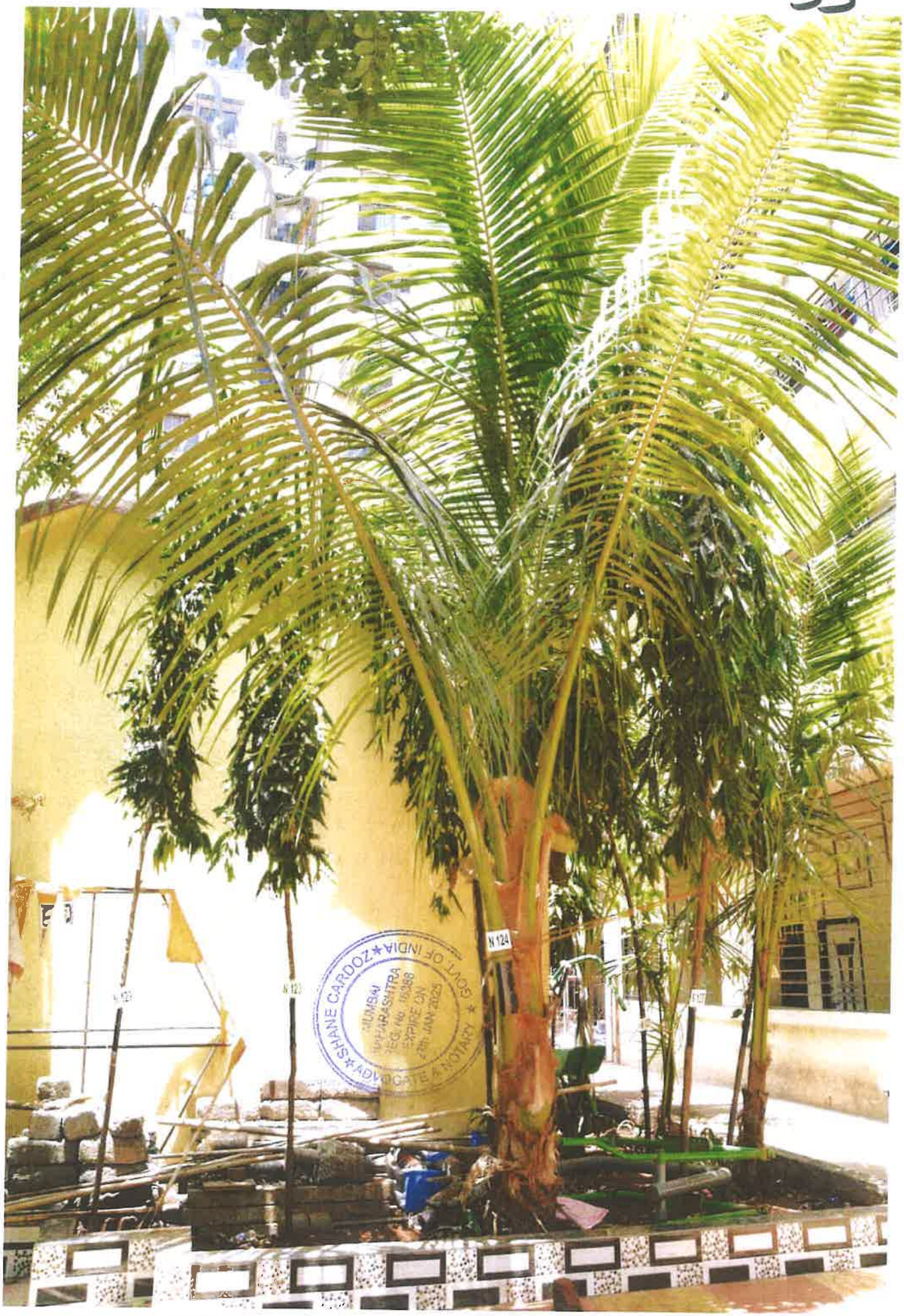
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MUMBAI
MAHARASHTRA
REG. No. 15388
EXPIRE ON
ADVOCATE & NOTARY

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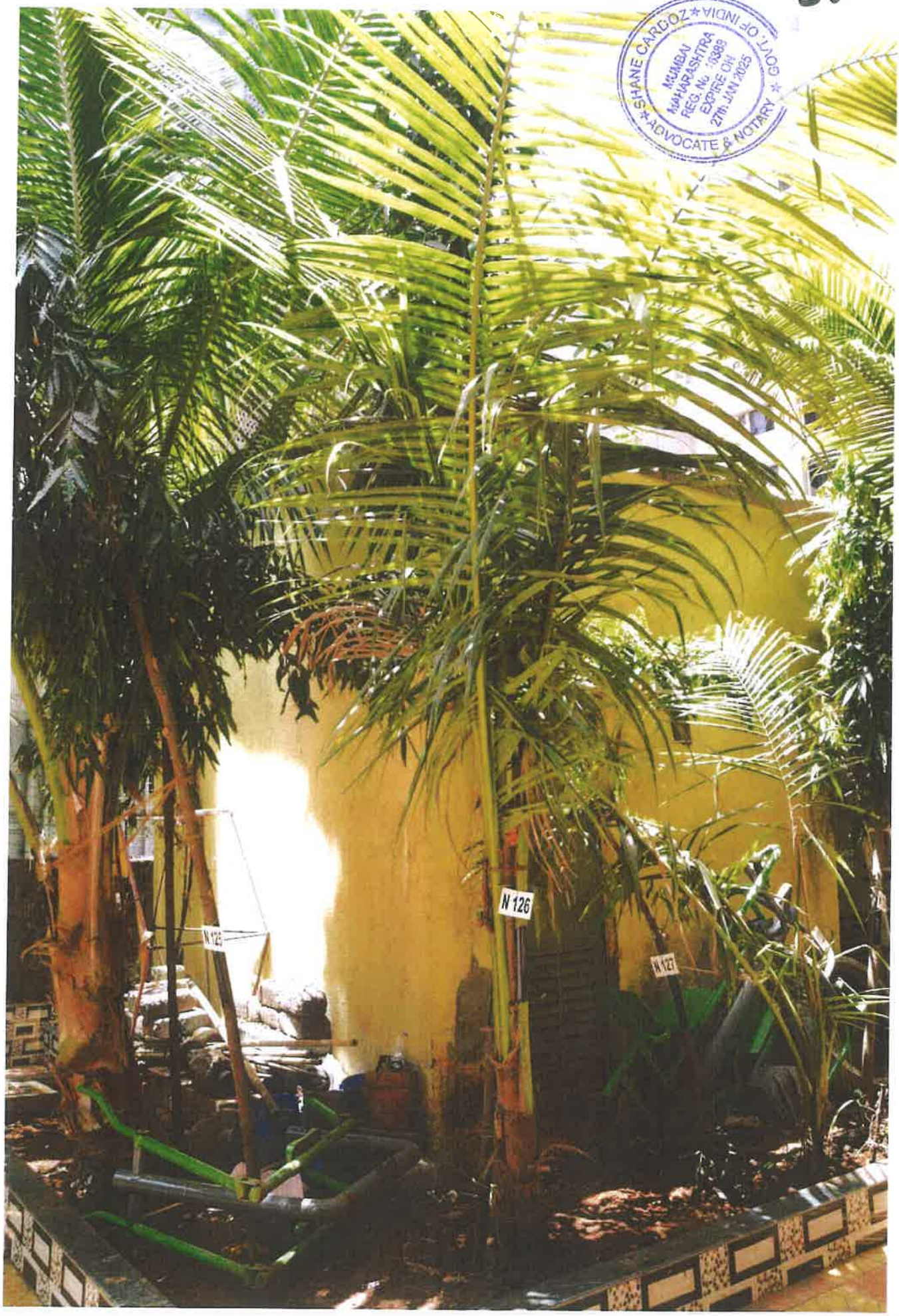

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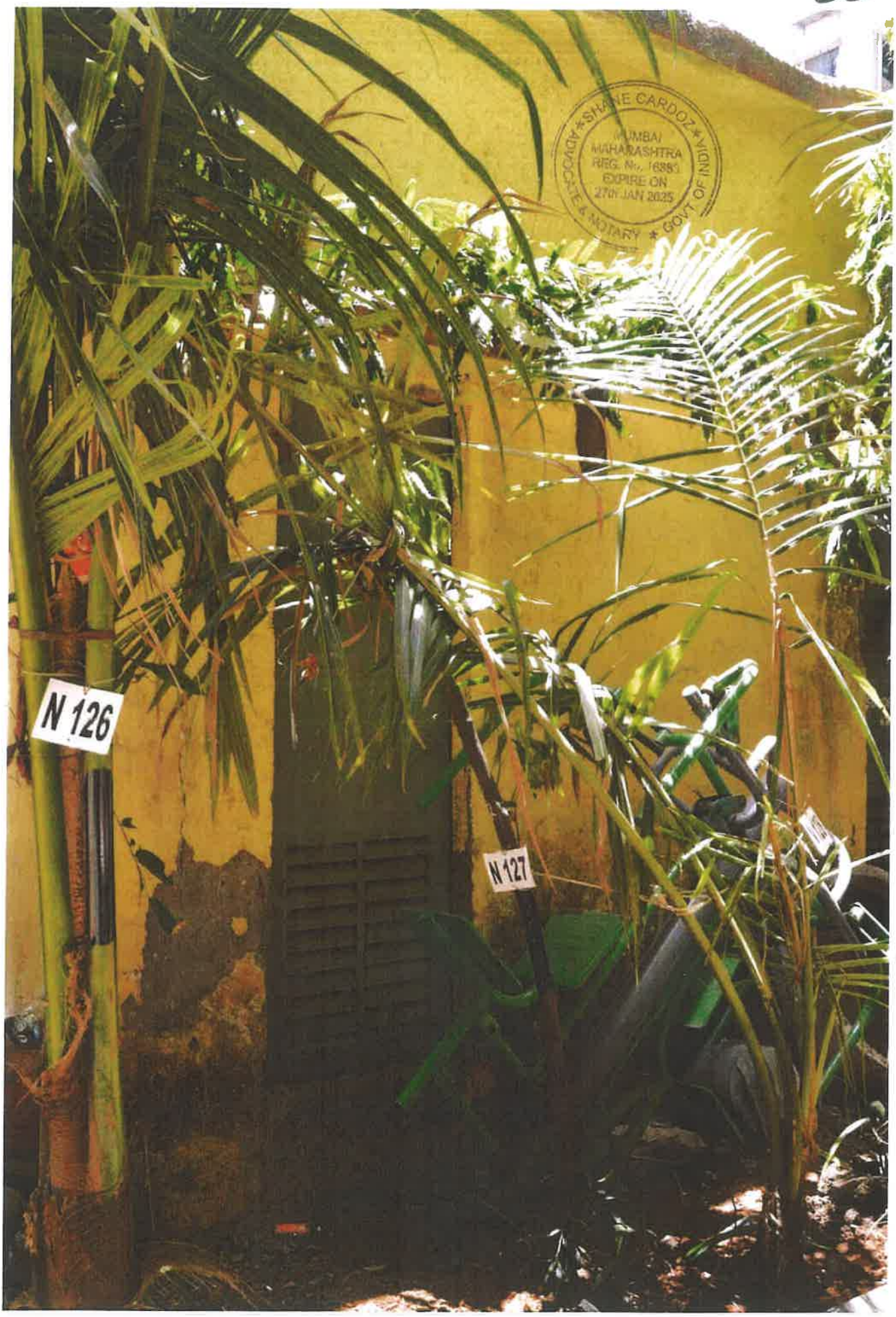
SHANE CARDOZ
ADVOCATE & NOTARY
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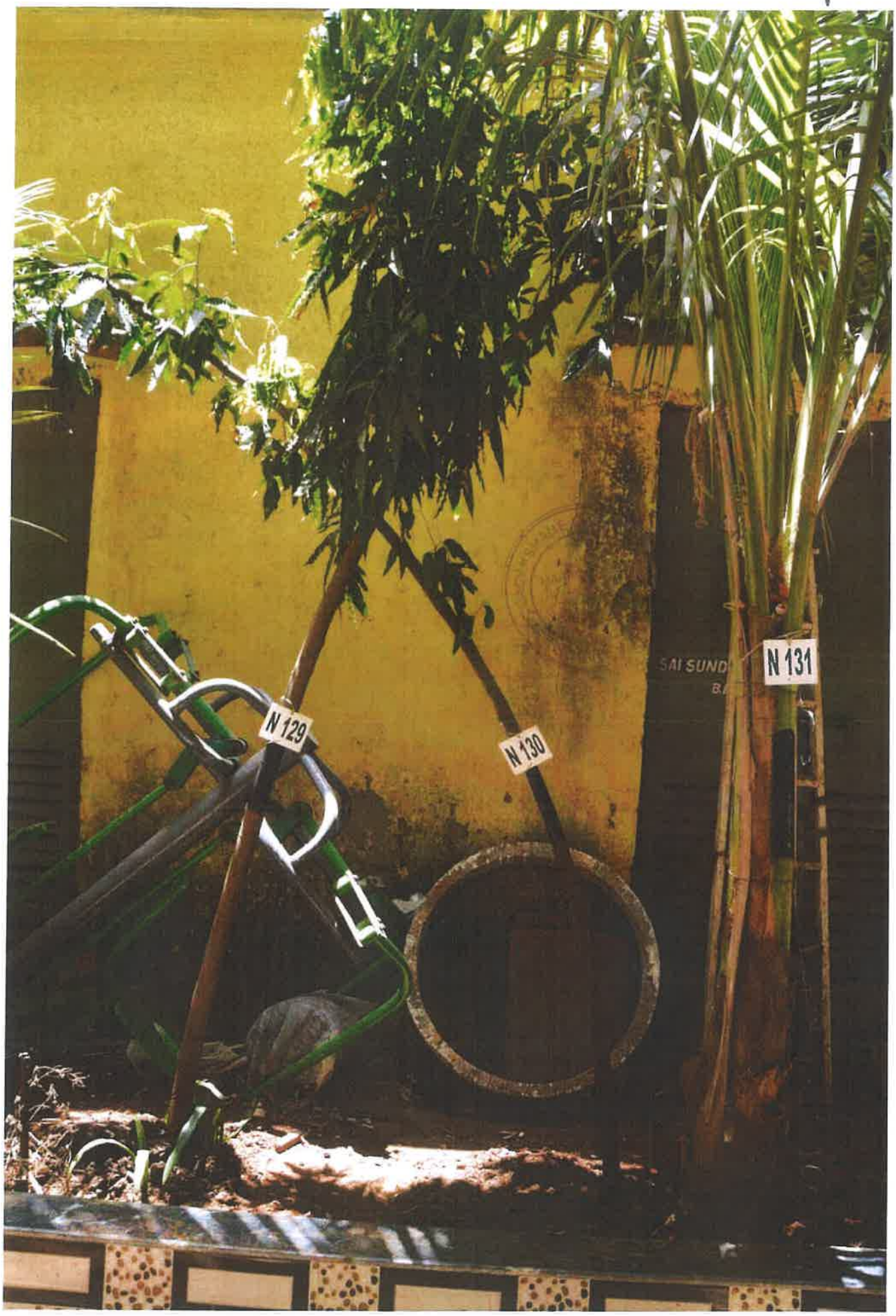

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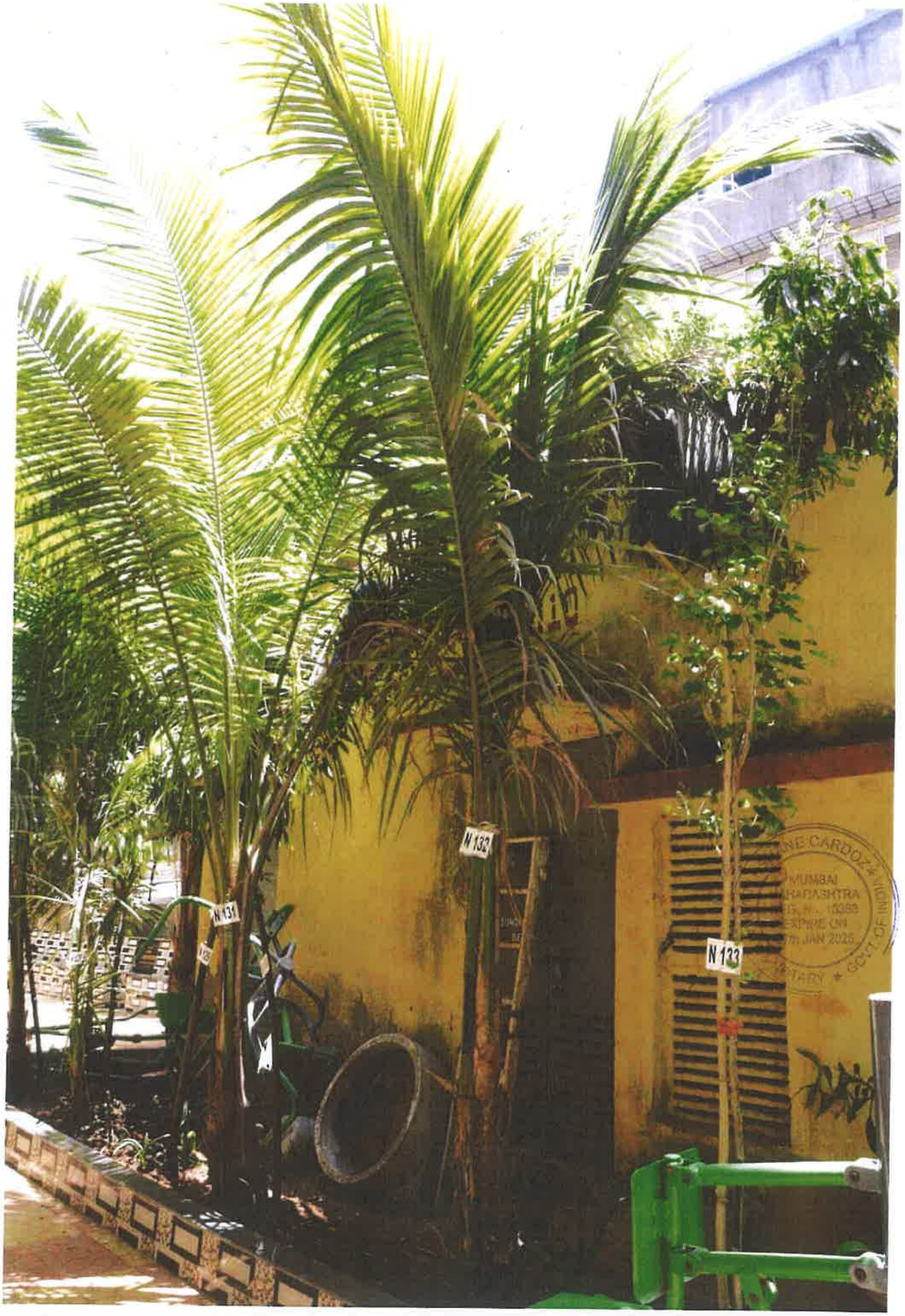


42

N 132
N 133
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 18388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

43

44

45

N 136
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 15328
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

46

N 137
MUMBAI
MAHARASHTRA
EXPIRE ON
27TH JAN 2025
NOTARY
GOVT.

47

N 138
MUMBAI
MAHARASHTRA
REG. NO. 16338
EXPIRE ON
27th JAN 2025

46

N 138
N 139
ALPHABET
PLAYHOUSE
SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA

49

SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16387
EXPIRE ON
27th JAN 2165
ADVOCATE & NOTARY
GOVT. OF INDIA

50

N 140
N 141
CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 15385
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

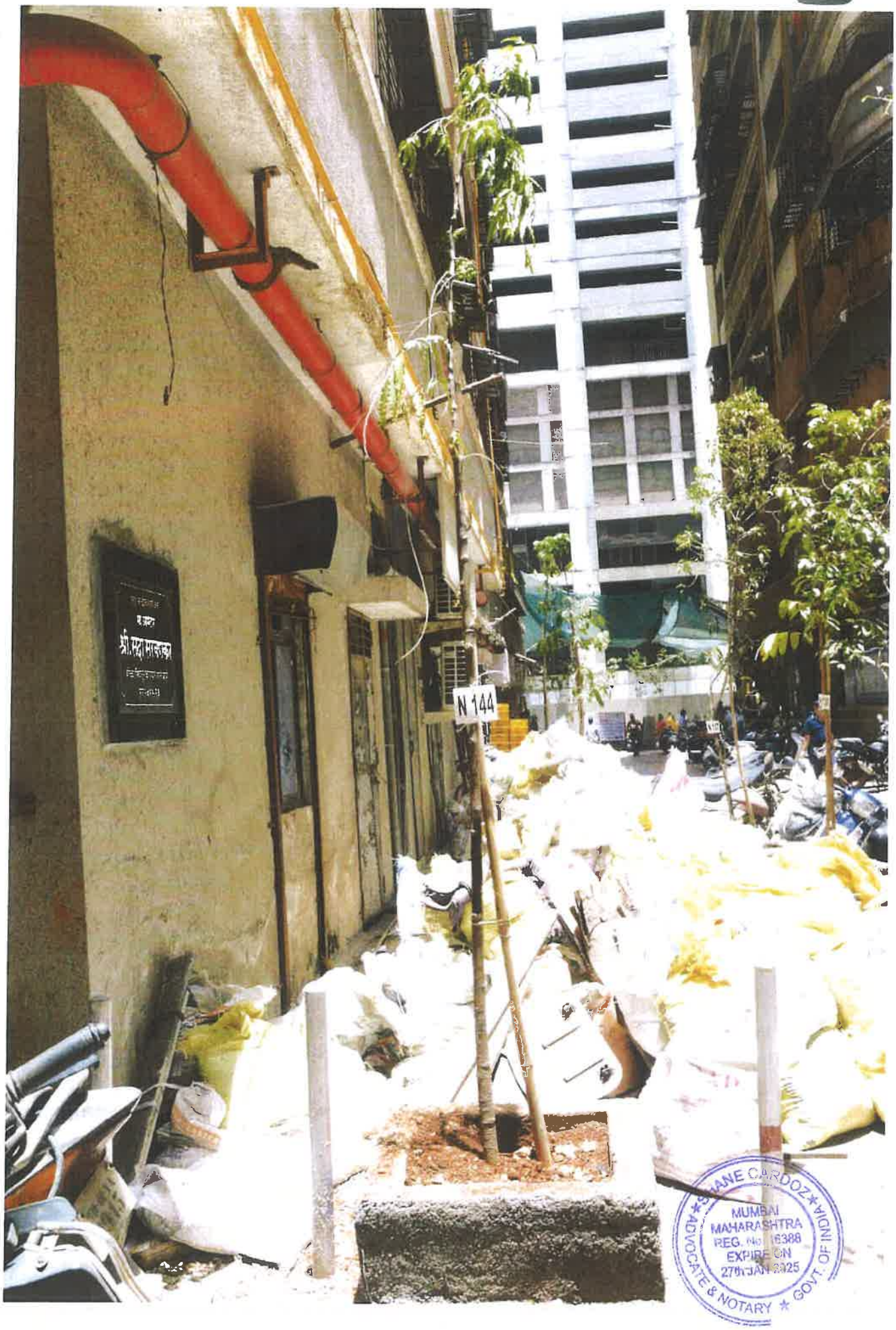
5

N 142
ALPHABET
PLAYHOUSE
MAHARASHTRA
REG. NO. 16398
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

52

ADVOCATE & NOTARY ★ GOVT. OF INDIA
MANE CARDOZ
MUMBAI
MAHARASHTRA
REG. NO. 16380
EXPIRE ON
27th JAN 2025

53


N 144
MUMBAI
MAHARASHTRA
EXPIRE ON
ADVOCATE & NOTARY
GOVT. OF INDIA

54

SHANE CARDOZ ★ ADVOCATE & NOTARY ★ GOVT OF INDIA
MUMBAI
MAHARASHTRA
REG. No. 9398
EXPIRE ON
27th JAN 2025

55

N 147
N 146
SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. NO. 16388
EXPIRE ON
JAN 2025

86

N 147
SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI
MAHARASHTRA

57

N 148
CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16398
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

58

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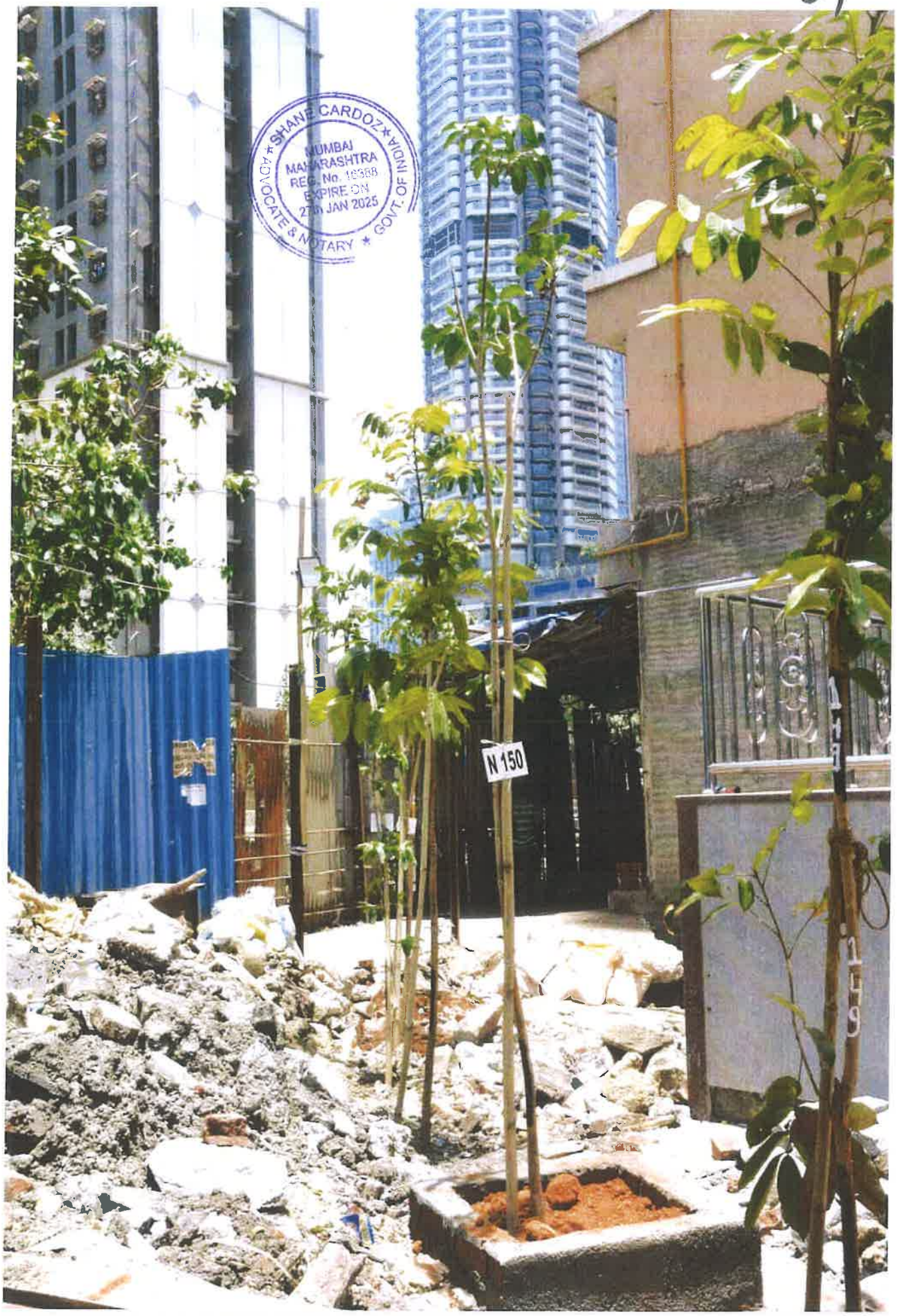
MUMBAI
MAHARASHTRA
REG. No.- 16388
EXPIRE ON
27th JAN 2025
VOCATE & NOTARY ★ GOVT. OF

59

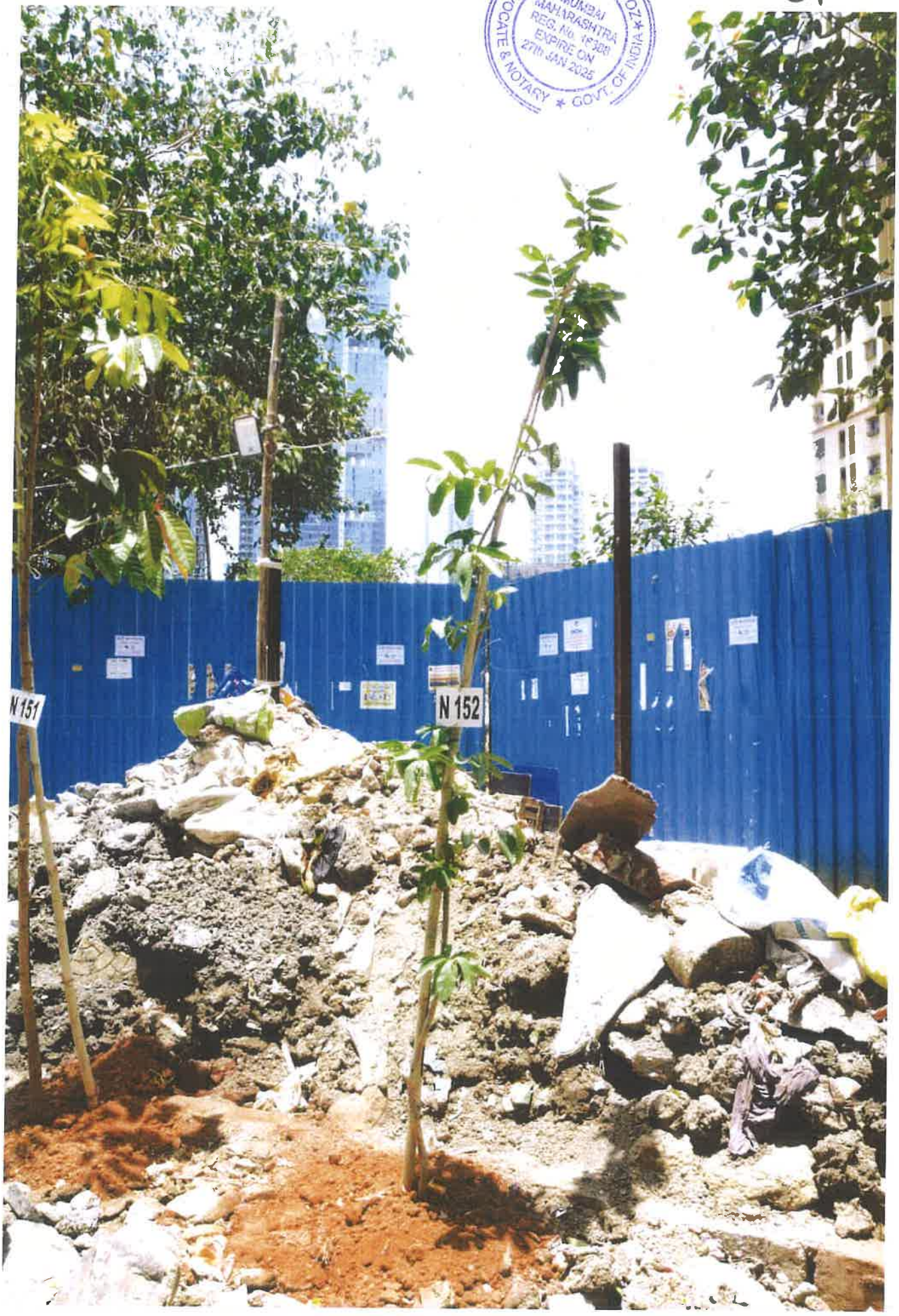


SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2025

60

61

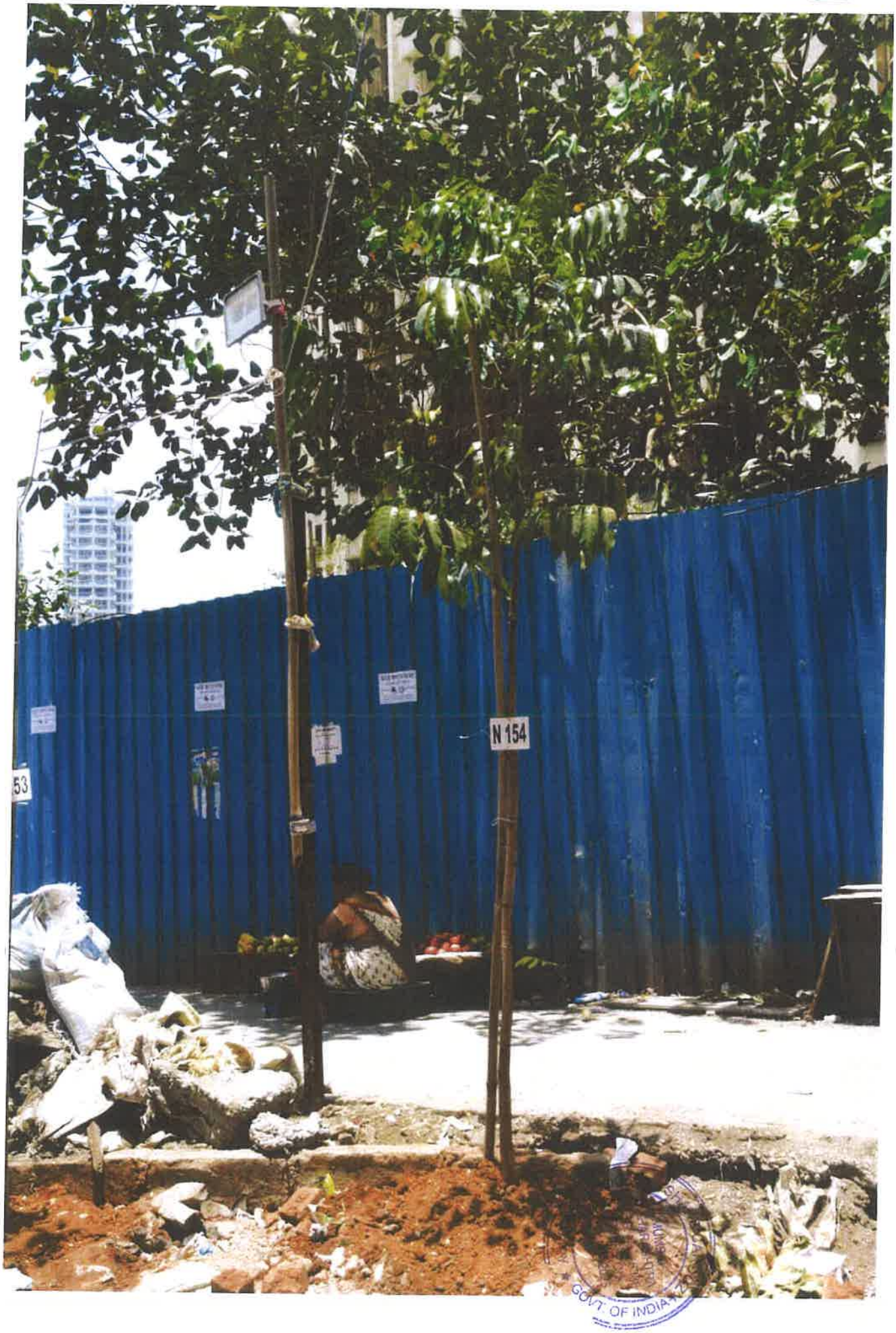
SHANE CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA



62

SHANE CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 16358
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA

63



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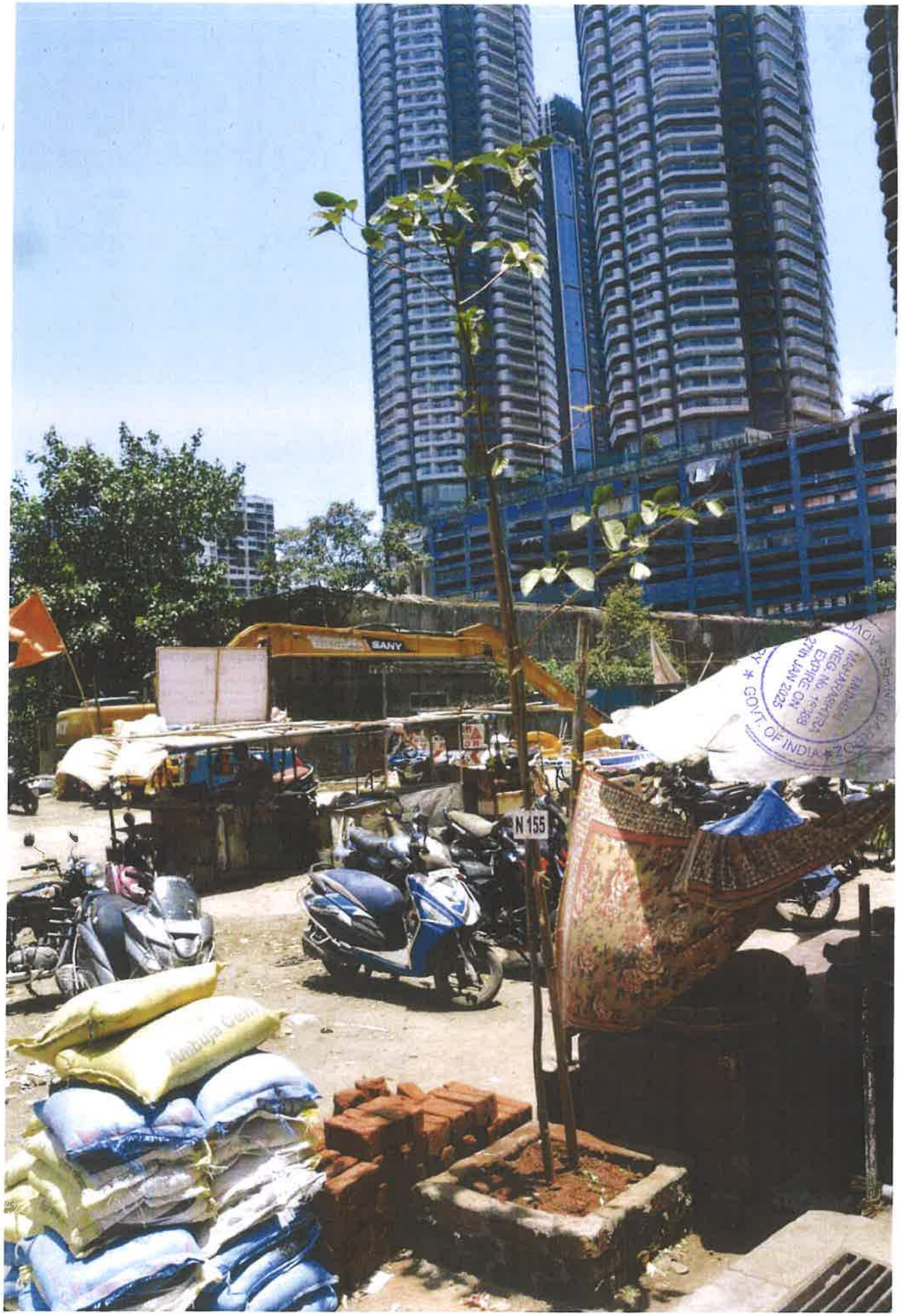


65

SHANE CARDOZ ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI MAHARASHTRA
REG. No. 1838
EXPIRE ON 2nd JAN 2025

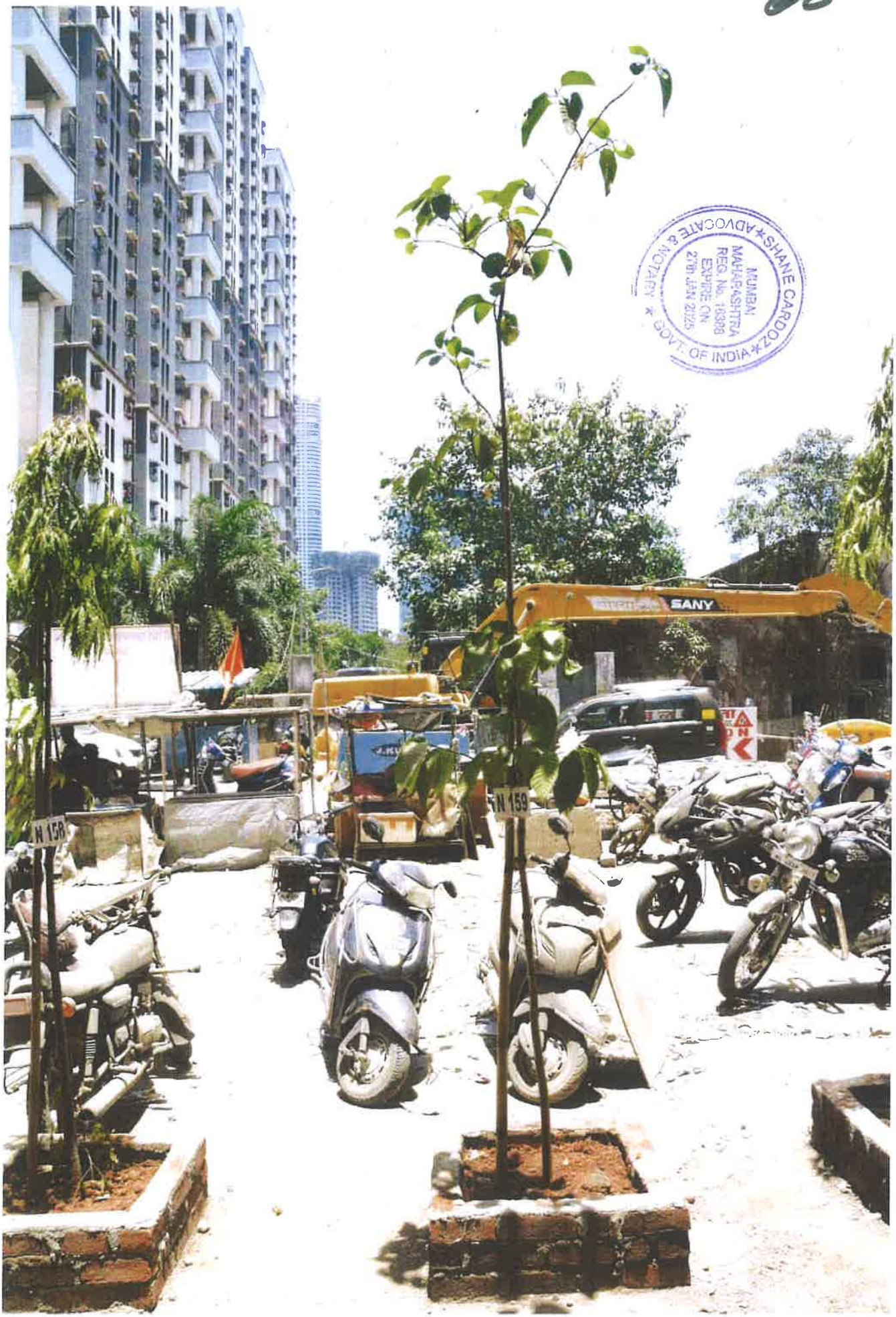
6G

SHANE CARDO ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. NO. 18208
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA

67

सेंच्युरी मिल म्हाडा सं
N 158
157
SHANE CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 1638
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA

68



ADVOCATE & NOTARY SHANE CARDOZ
MUMBAI MAHARASHTRA
REG. No. 16388
EXPIRE ON 27th JAN 2025
GOVT. OF INDIA

69

ADVOCATE & NOTARY ★ SHANE CARDOZ ★ GOVT. OF INDIA ★
MUMBAI MAHARASHTRA
REGD. NO. 1638R
EXPIRE ON
27TH JAN 2022

20

ADVOCATE & NOTARY * GOVT. OF INDIA *
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2025

71

72

73

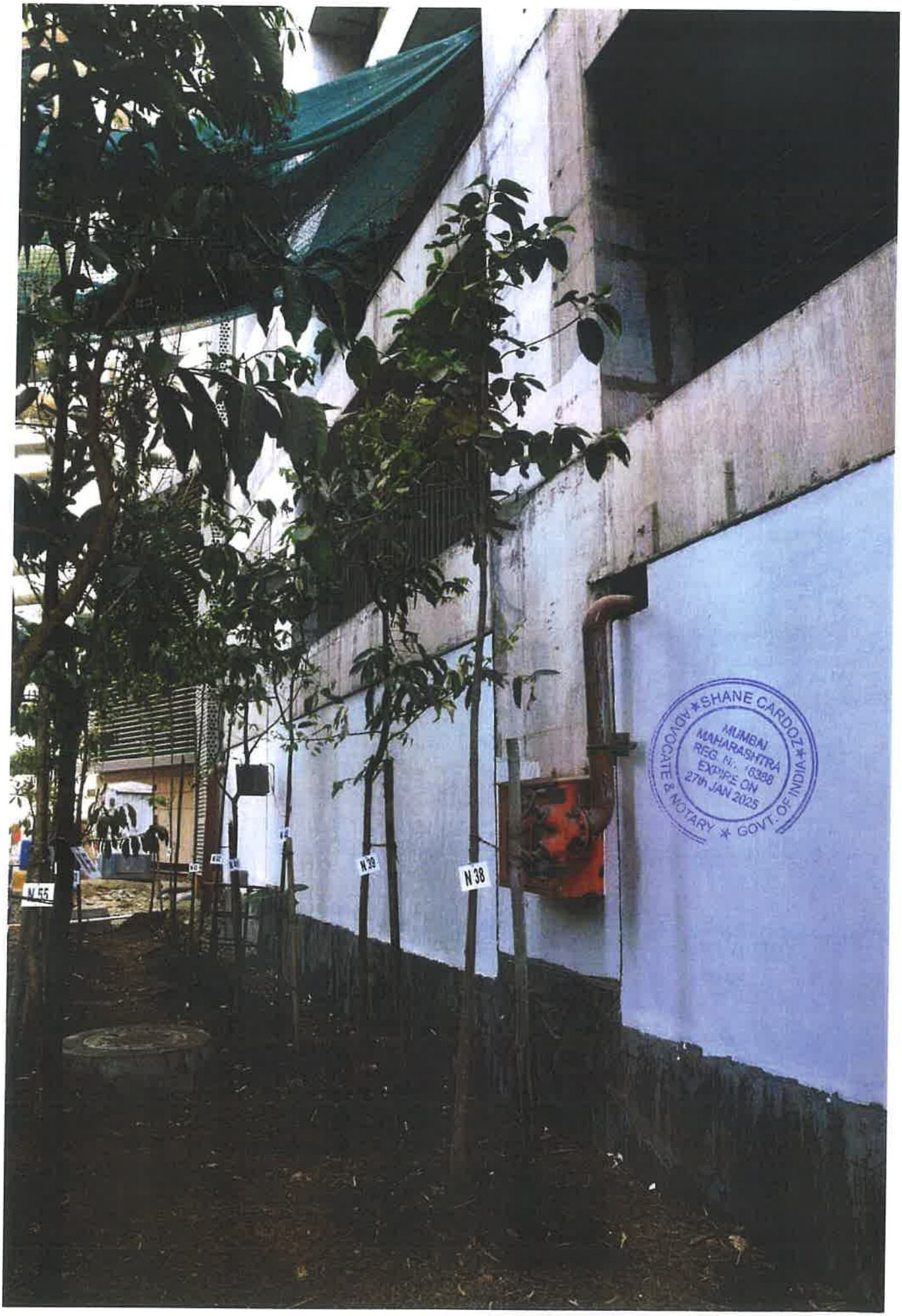
SHANE CARDOZ ★ ADVOCATE & NOTARY ★ GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. No. 18368
EXPIRE ON
27th JAN 2025

74

N 37
N 36
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY GOVT. OF INDIA

75

N 57
N 37
SHANE CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 16368
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA



SHANE CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. NO. 16338
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA

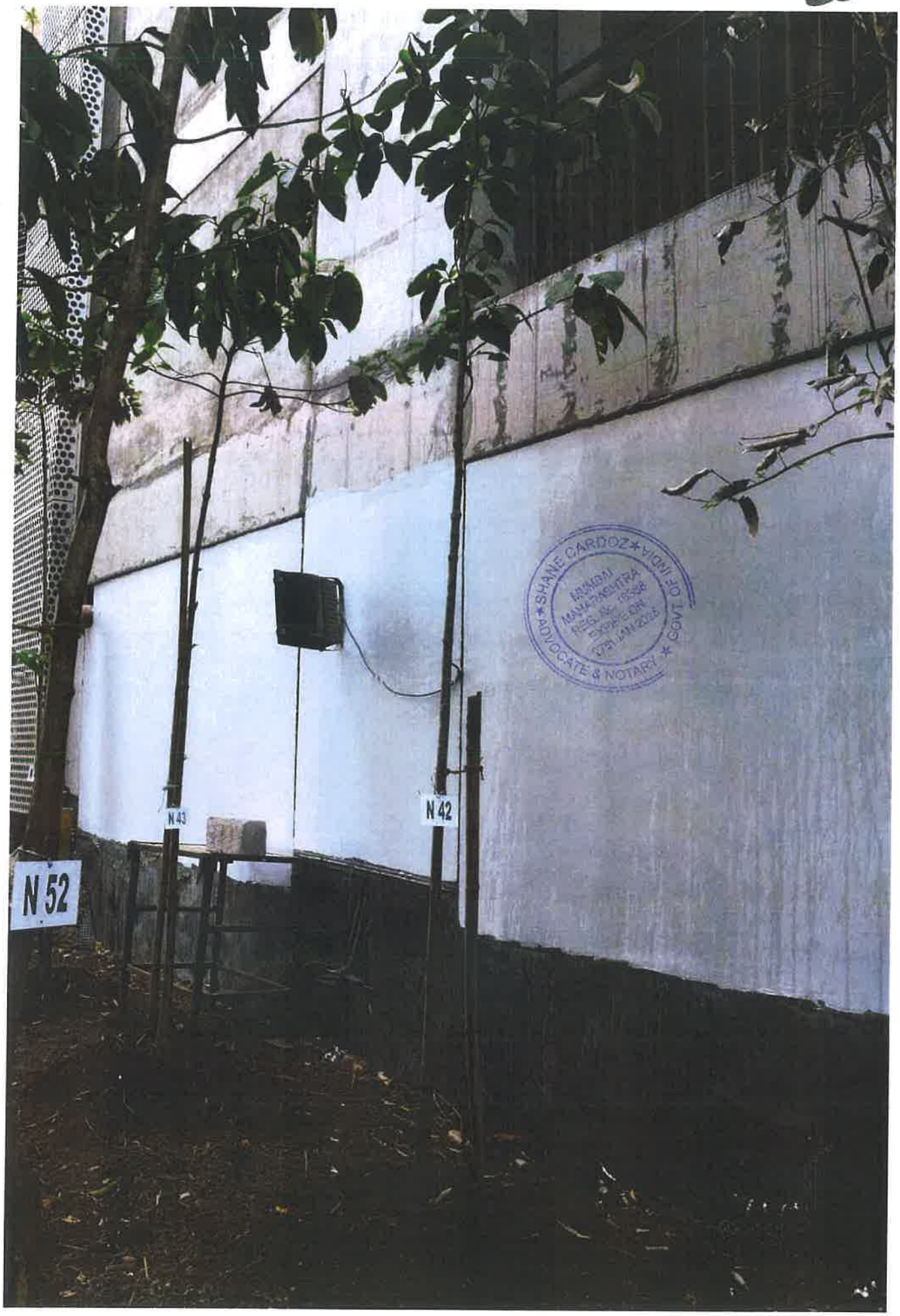
77

N 39
N 38
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16338
EXPIRE ON
27 JAN 2025
NOTARY
GOVT. OF INDIA

N 53
N 42
N 41
N 40
N 39
SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
NEMBAN
MAHARASHTRA
REG. NO. 16388
EXPIRE ON
27 JAN 2026

79

80


N 43
N 42
N 52
SHANE CARDOZ
MUMBAI
MAHARASHTRA
ADVOCATE & NOTARY
GOVT. OF INDIA

81

N 49
N 43
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 14988
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

82

N 50
N 49
N 45
N 44
N 43
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. NO. 16388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

83

84

SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG No. 16388
EXPIRES ON
27th Jan 2025
ADVOCATE & NOTARY

85

86

87

SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16308
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

88

89

SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 19338
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY * GOVT. OF INDIA

90

SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. NO
EXPIRE ON
JAN 2025
ADVOCATE & NOTARY * GOVT

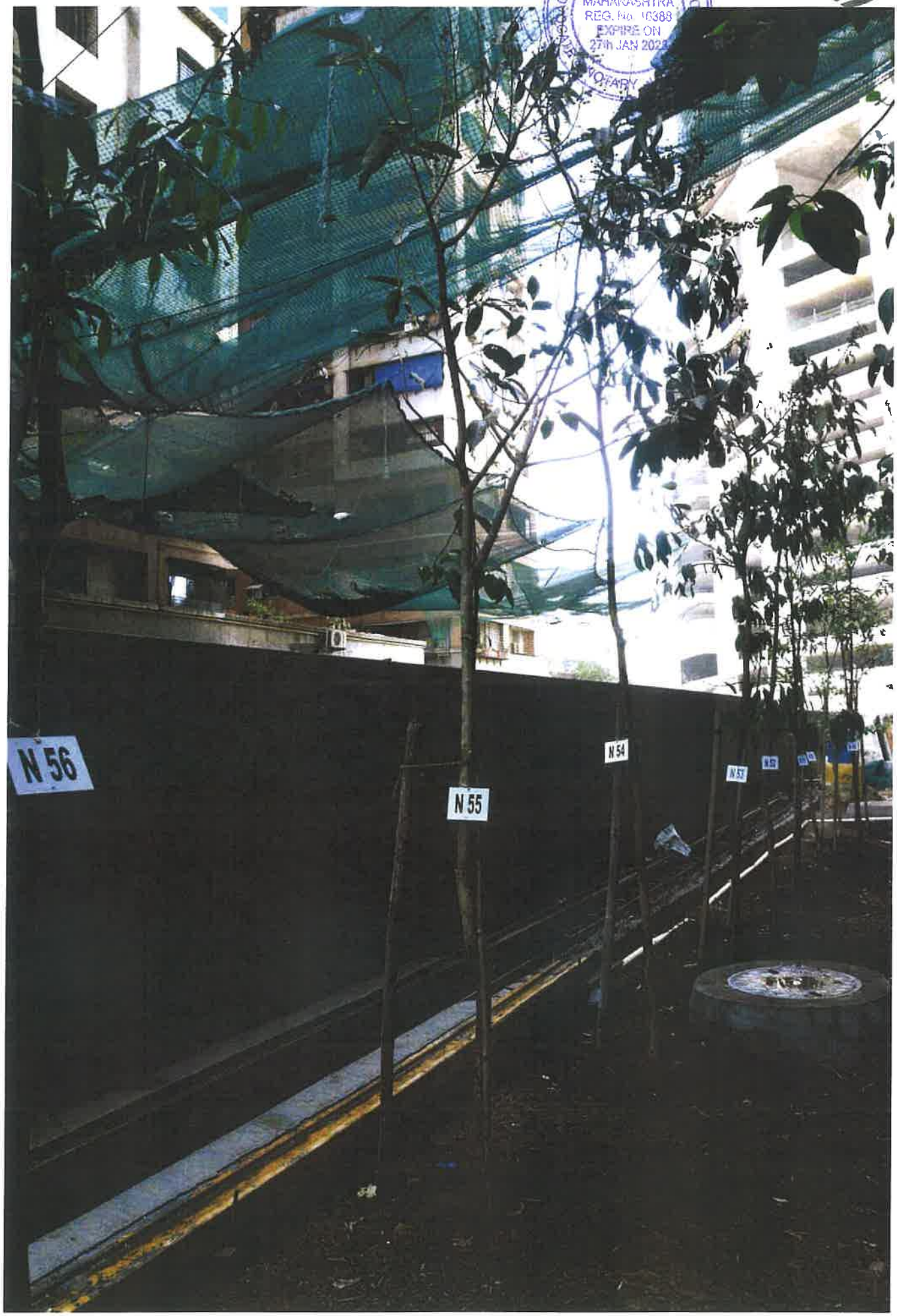
71

SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
JAN 2025
ADVOCATE & NOTARY ★ GOVT. OF INDIA

92

93

SHANE CARDOZ ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2023

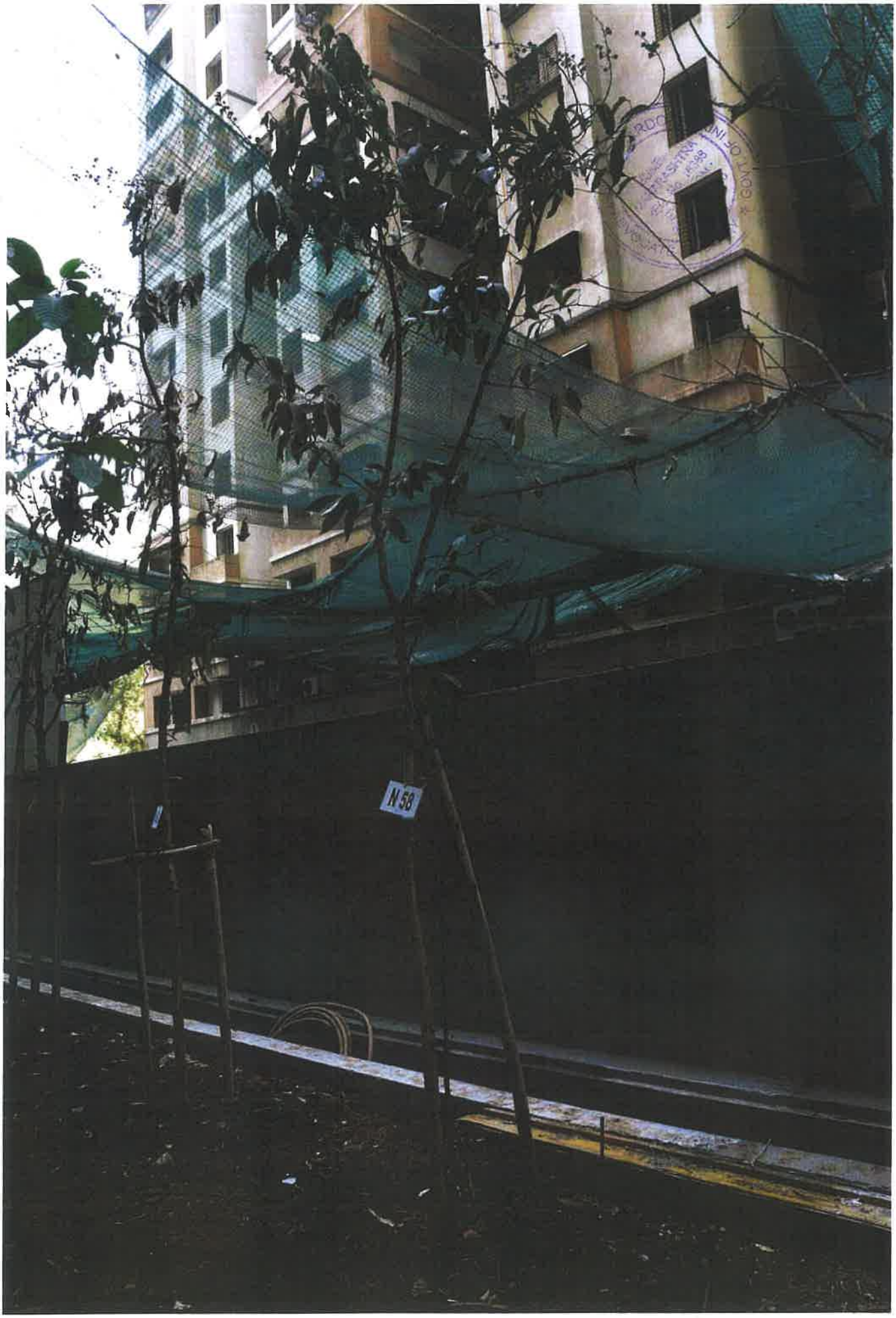


94

SHANE CARDOZ ★ GOVT. OF INDIA ★
MUMBAI
MAHARASHTRA
REG. No. 16298
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY

95

96



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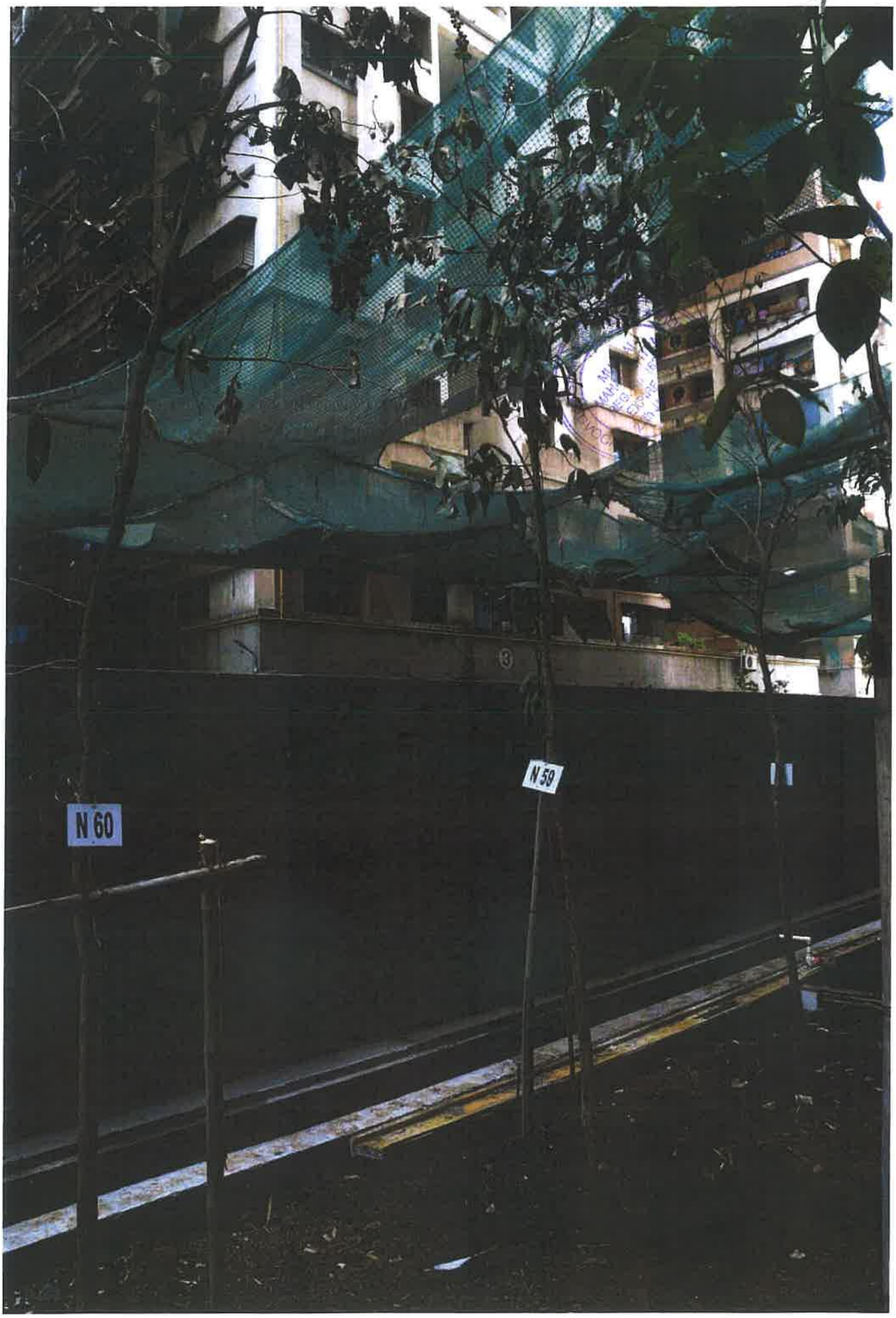

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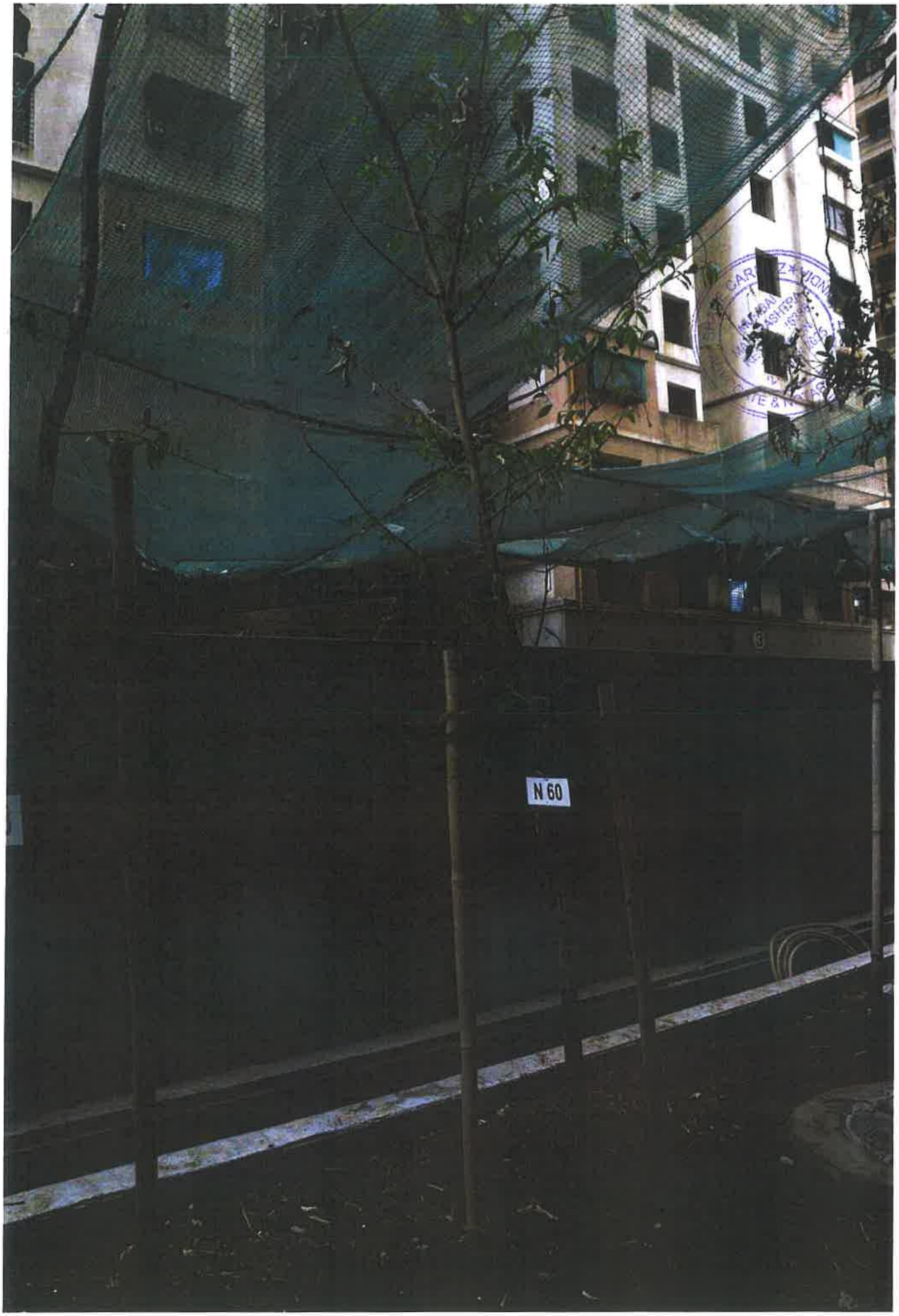

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SHANE CARDOZ ADVOCATE & NOTARY MUMBAI MAHARASHTRA REG. No. 16389 EXPIRE ON 27th JAN 2025 GOVT. OF INDIA

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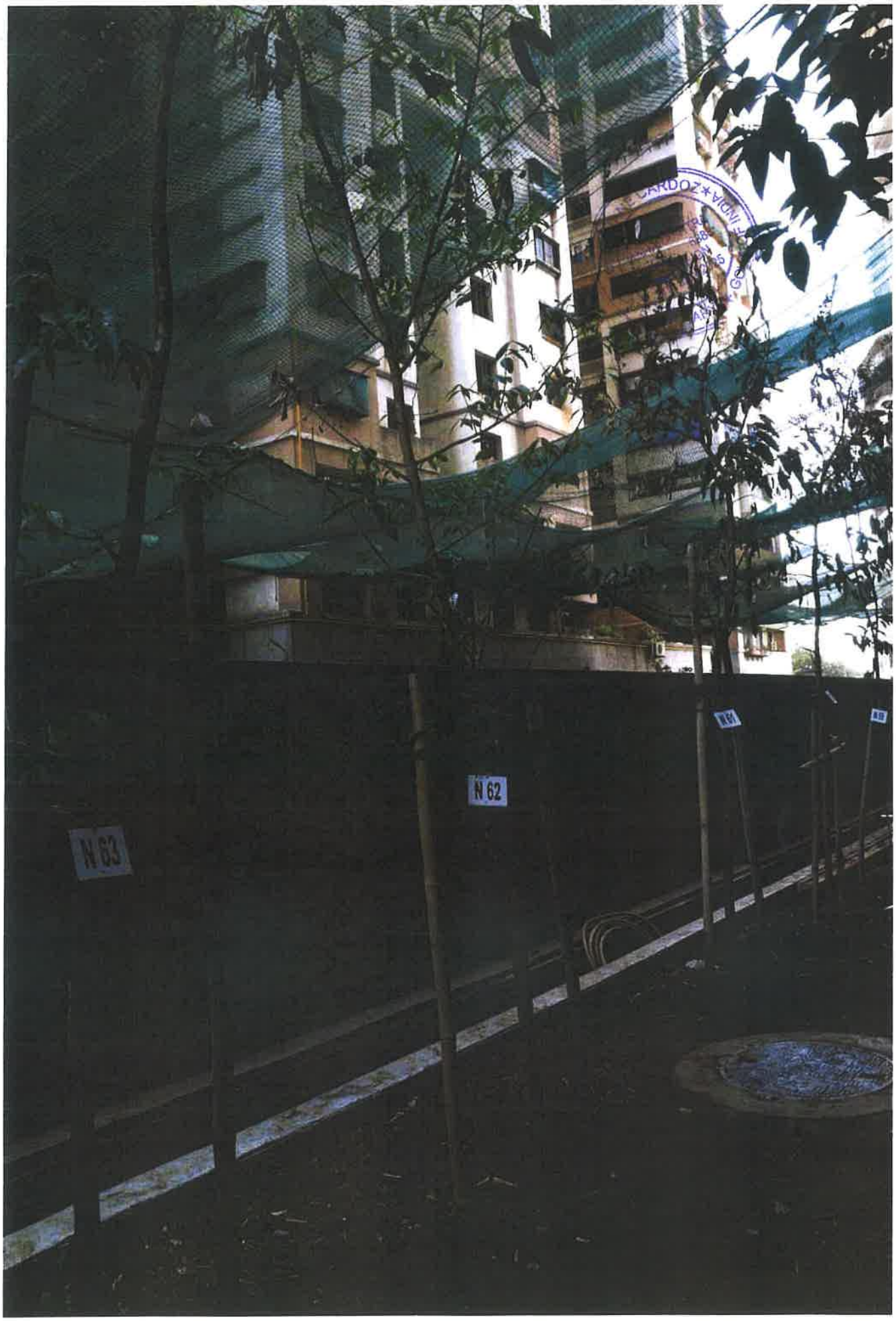

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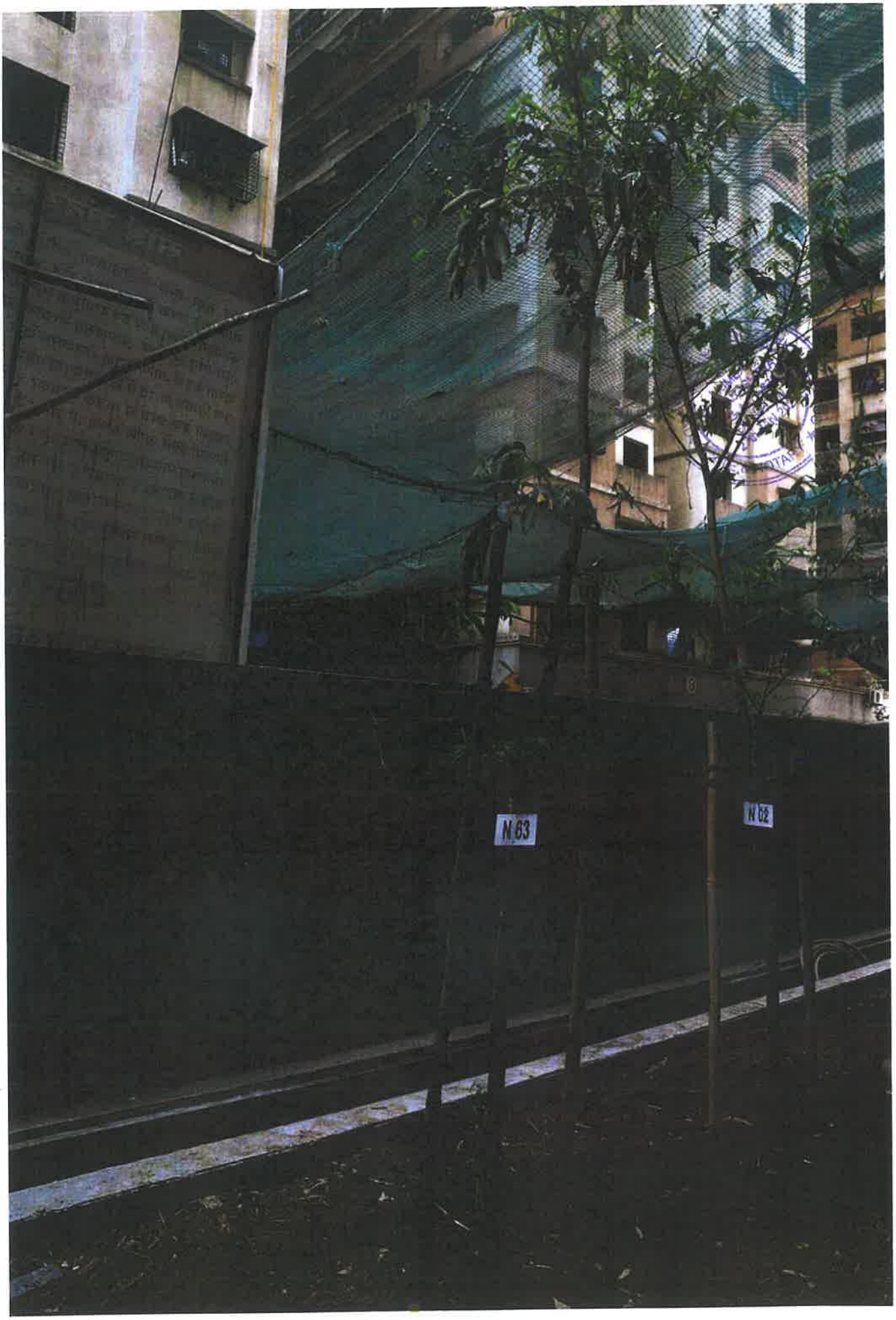


102

103

104

SHANE CARDOZ ★ GOVT OF INDIA ★ ADVOCATE & NOTARY ★ MUMBAI MAHARASHTRA REG. NO. 18828 EXPIRE ON 27TH JAN 2025

105

N 166
N 167
MH.04.BK.3159
SHANE CARDOZ
MUMBAI
MAHARASHTRA
GOVT. OF INDIA

106

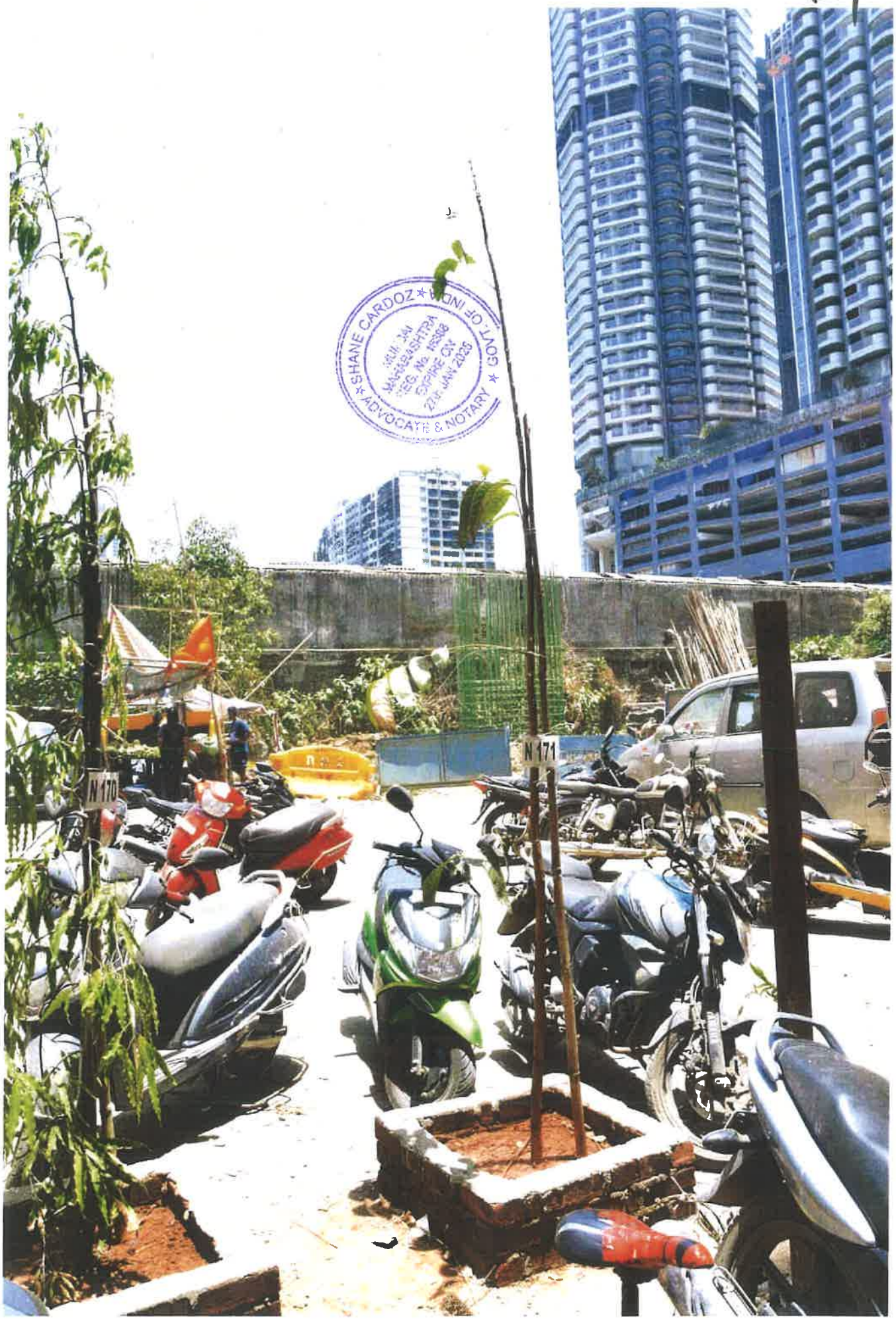
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. NO. 15398
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

107

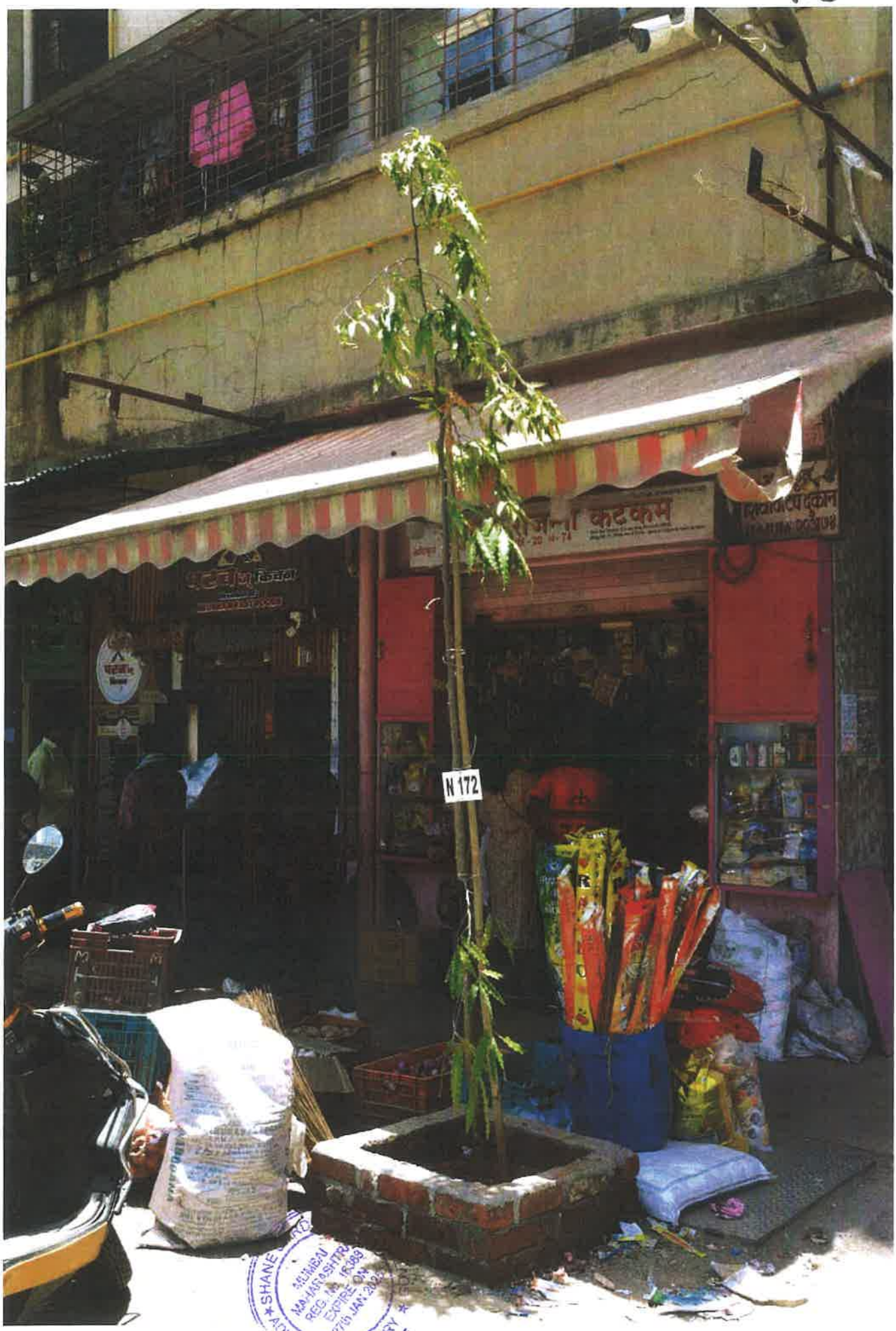
एस.आर.ए.
गृह.संस्था
१२
पांडुरंग क्लिनिक
PANDURANG CLINIC
N 169
N 168
MH01 CH0654
SHANE CARDOZ
MUMBAI MAHARASHTRA
REG. NO. 16338
EXPIRE ON 22TH JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

108

109

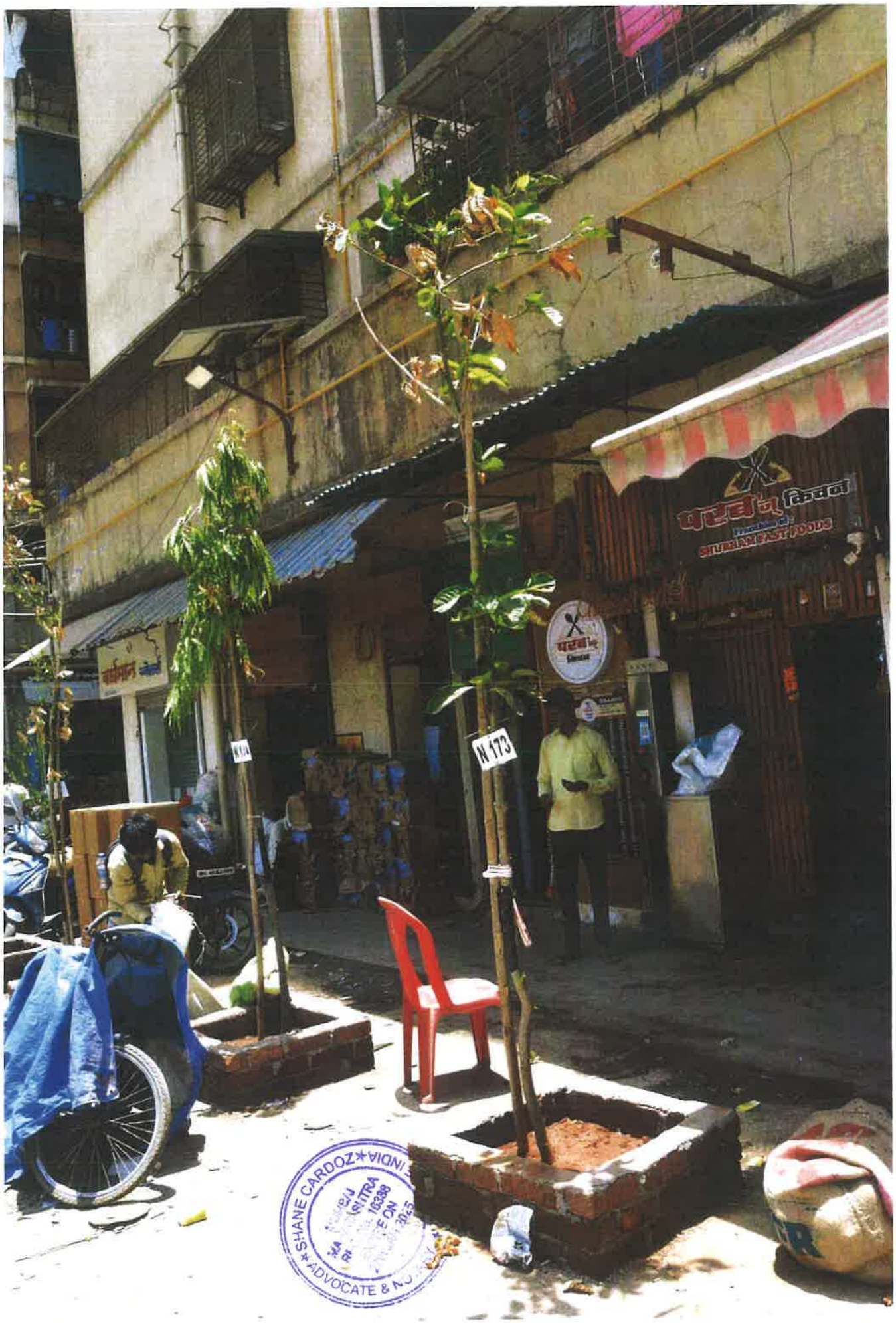

SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. No. 15588
EXPIRE ON
27th JAN 2025
N 170
N 171

110



SHANE ADVOCATE & NOTARY MUMBAI MAHARASHTRA REG. NO. 16389 EXPIRE ON 27th JAN 2022

१२१



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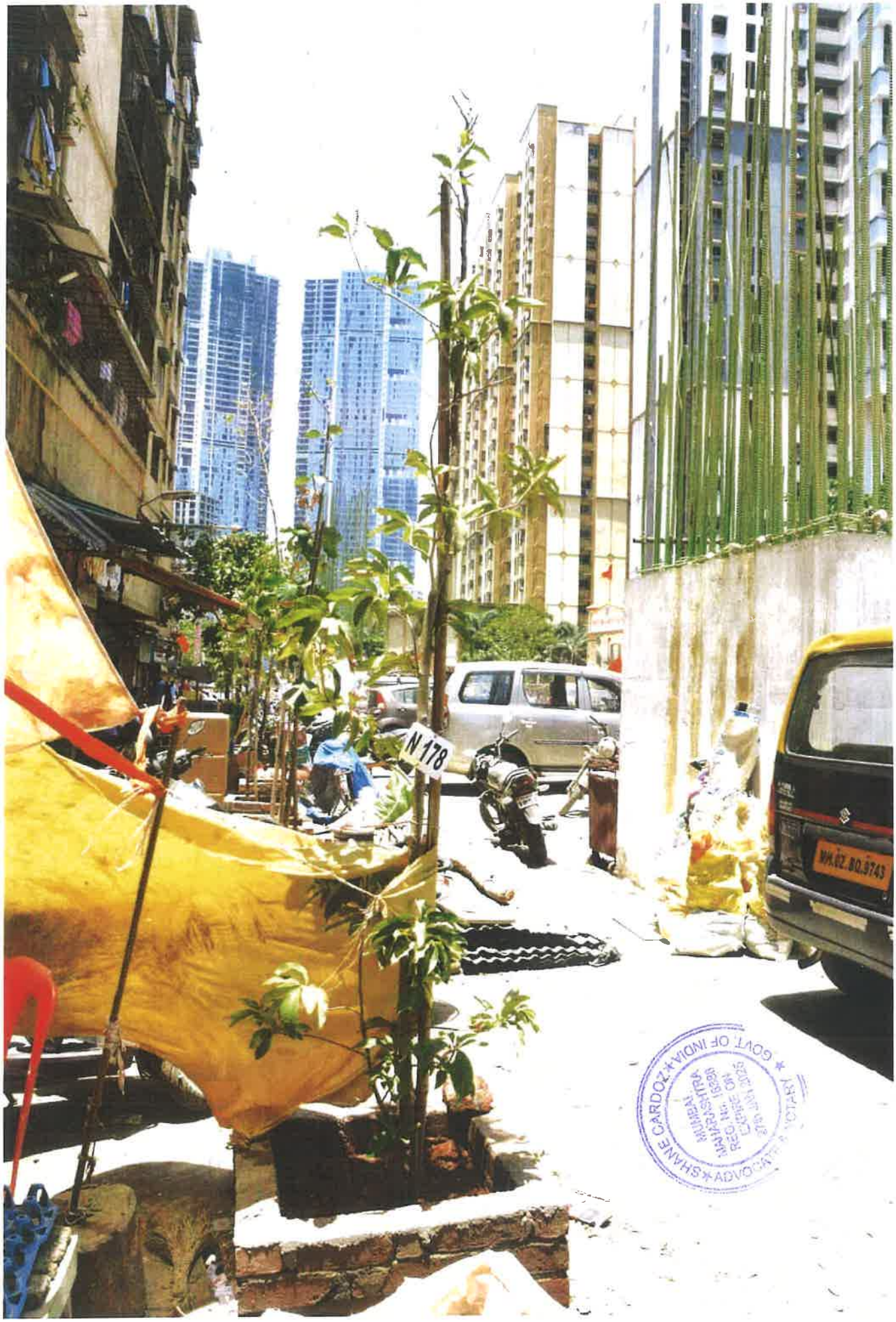
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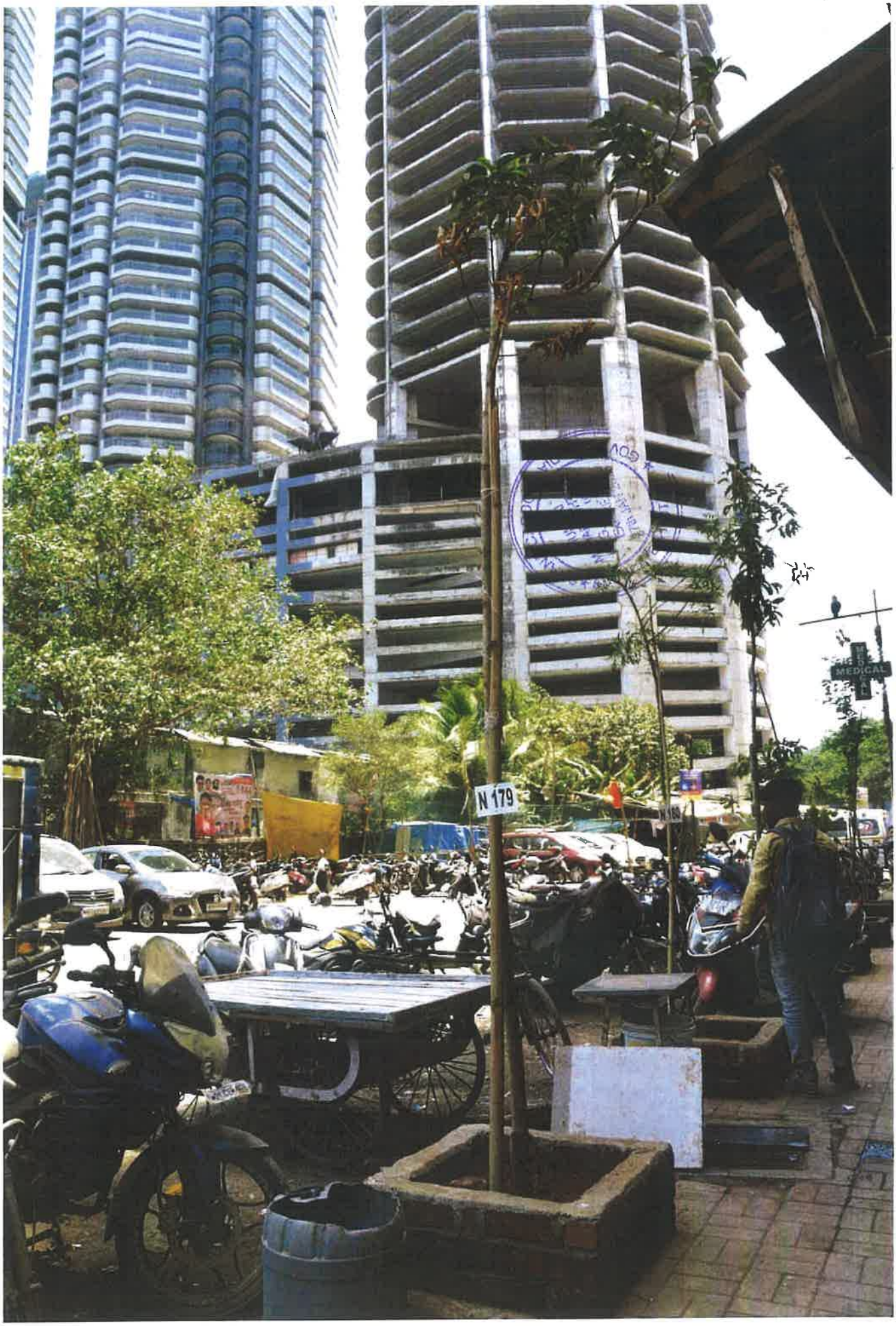
SHANE CARDOZ ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. No. 16298
EXPIRE ON
27th JAN 2025

117



118

119

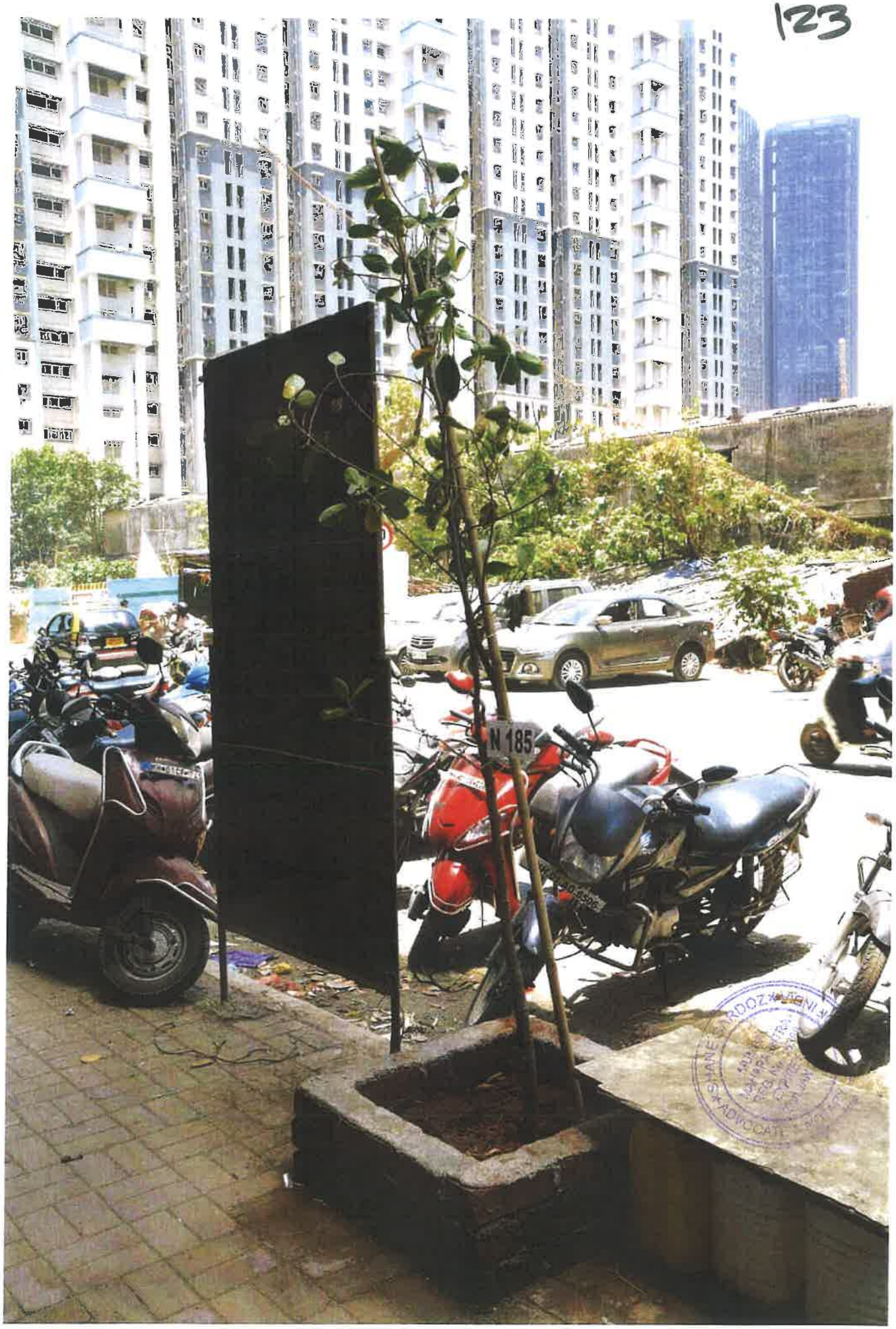
120

121

SHANE CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
REG. No. 16358
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA

122

123



124

125

GOVT. OF INDIA
ADVOCATE & NOTARY

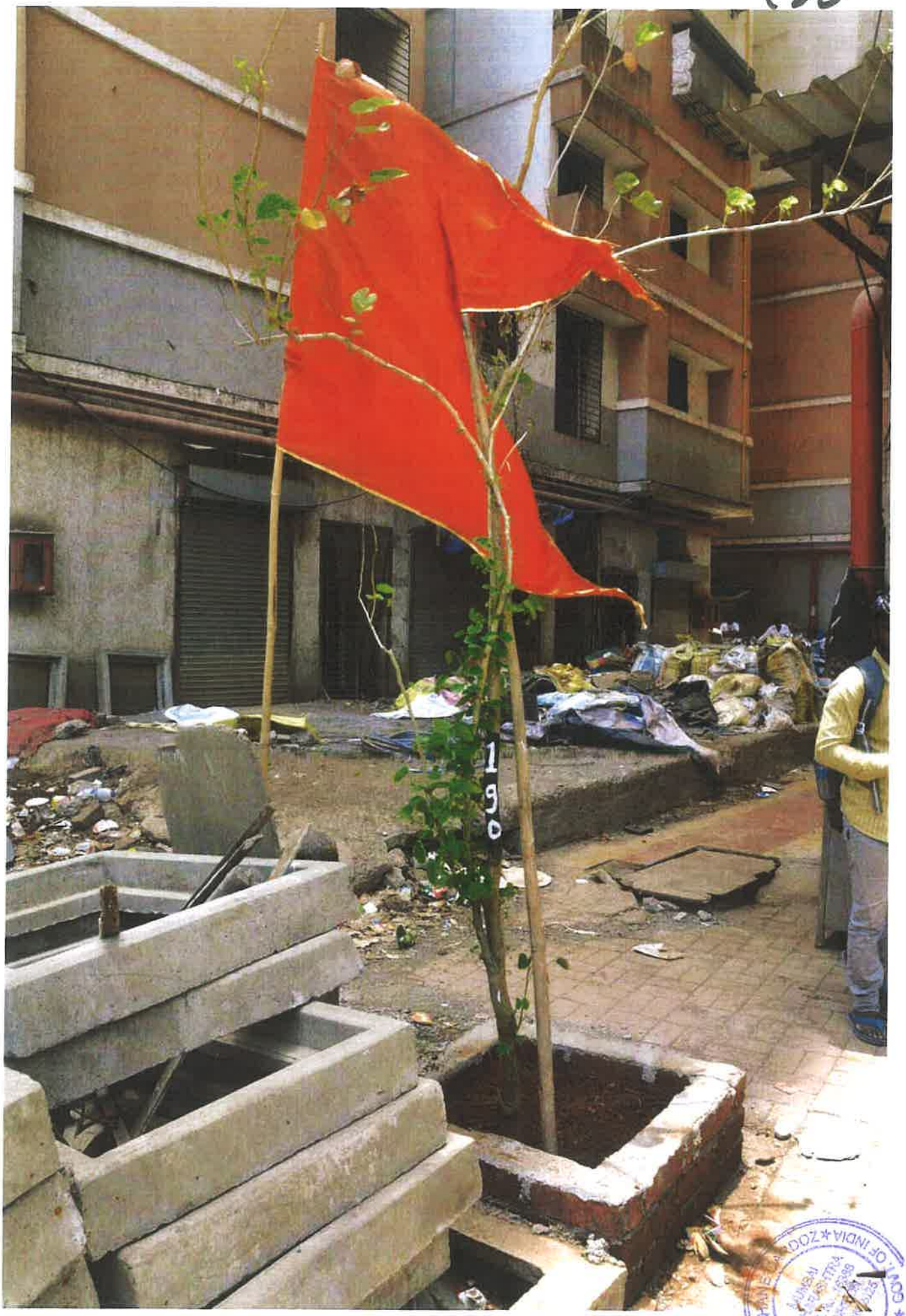
126

SHAME CARD ★ GOVT. OF INDIA ★ ADVOCATE & NOTARY

127

ADVOCATE & NOTARY GOVT. OF INDIA
MUMBAI MAHARASHTRA REG. NO. 16388 EXPIRE ON 27th JAN 2025

(78



ADVOCATE & NOTARY

129

130

131

132

SHANE CARDOZ ★ VIONI ★ GOVT. OF
MUMBAI MAHARASHTRA
REG. No. 1658
EXPIRE ON
27TH JAN 2026
ADVOCATE & NOTARY

133

SHANE ... ADVOCATE & NOTARY
MUMBAI MAHARASHTRA REG. NO. 15388 EXPIRE ON 27th JAN 2025
GOVT. OF INDIA

134

कोमल ब्युटी सलून अँड स्पा
अमन हेअर कट सलून
AMAN HAIR CUT SA
Wonder Color
Aman
Hair Cut
Saloon
N 196

135

136

SHANE CARDOZ
MUMBAI MAHARASHTRA
REG. NO. 16388
EXPIRE ON 27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA
ANANYA & SHUBHRA
SNACKS CORNER & TIFFIN SERVICE
अनन्या आणि शुभ्रा
टिफीन मिळेल
व्हेज-नॉन व्हेज राईस प्लेट
मो. 98204 74790 • 95949 67360
कोमल ब्युटी सलून
N 198
MH 01 CA 7207

137

SHANE CARDOZ
MUMBAI MAHARASHTRA
SEQ. NO. 16398
EXPIRE ON
27TH JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA
ANANYA & SHUBHRA
SNACKS CORNER & TIFFIN SERVICE
अनन्या आणि शुभ्रा
टिफीन मिळेल
मो. 98204 74790 • 95949 6736
कोमल ब्युटी सलून
अनन्या आणि शुभ्रा
राईस प्लेट
मिसळ
N 199
Saloon

138

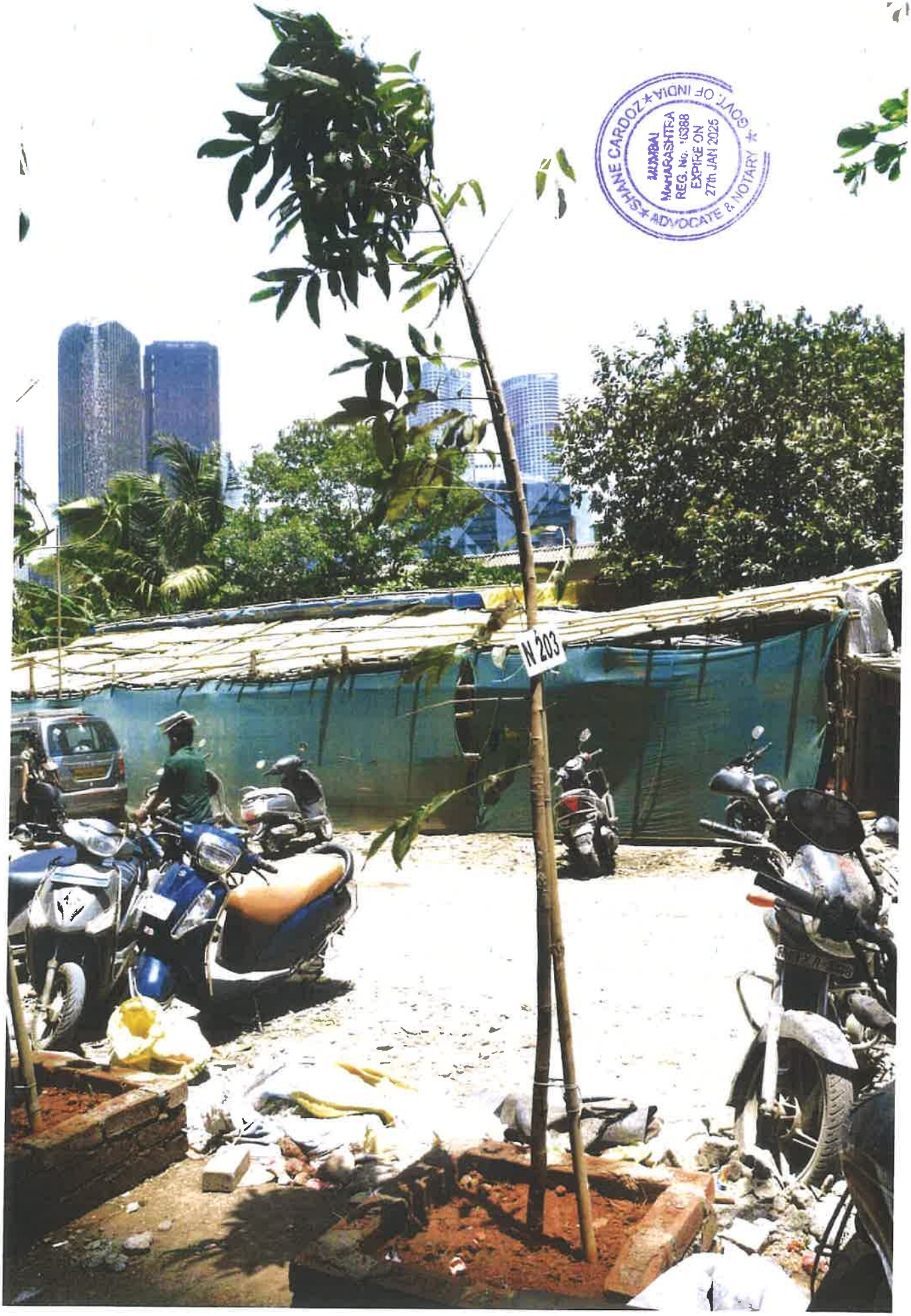
139

Mobiles & E-world
Mobile repairing
PERFECT CUT
परफेक्ट कट
SALON
श्री साई शिवशाही सह.गृहनिर्माण
N 201
SHANE CARDOZ
GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. NO. 1598
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY

120

Ambika Mobiles & E-world
Mobile repairing
All mobile accesories Availabe
EMI payments accepted
LIC
तात्काल मनी ट्रांसफर
RFECT
CUT
SALON
N 202
oppo

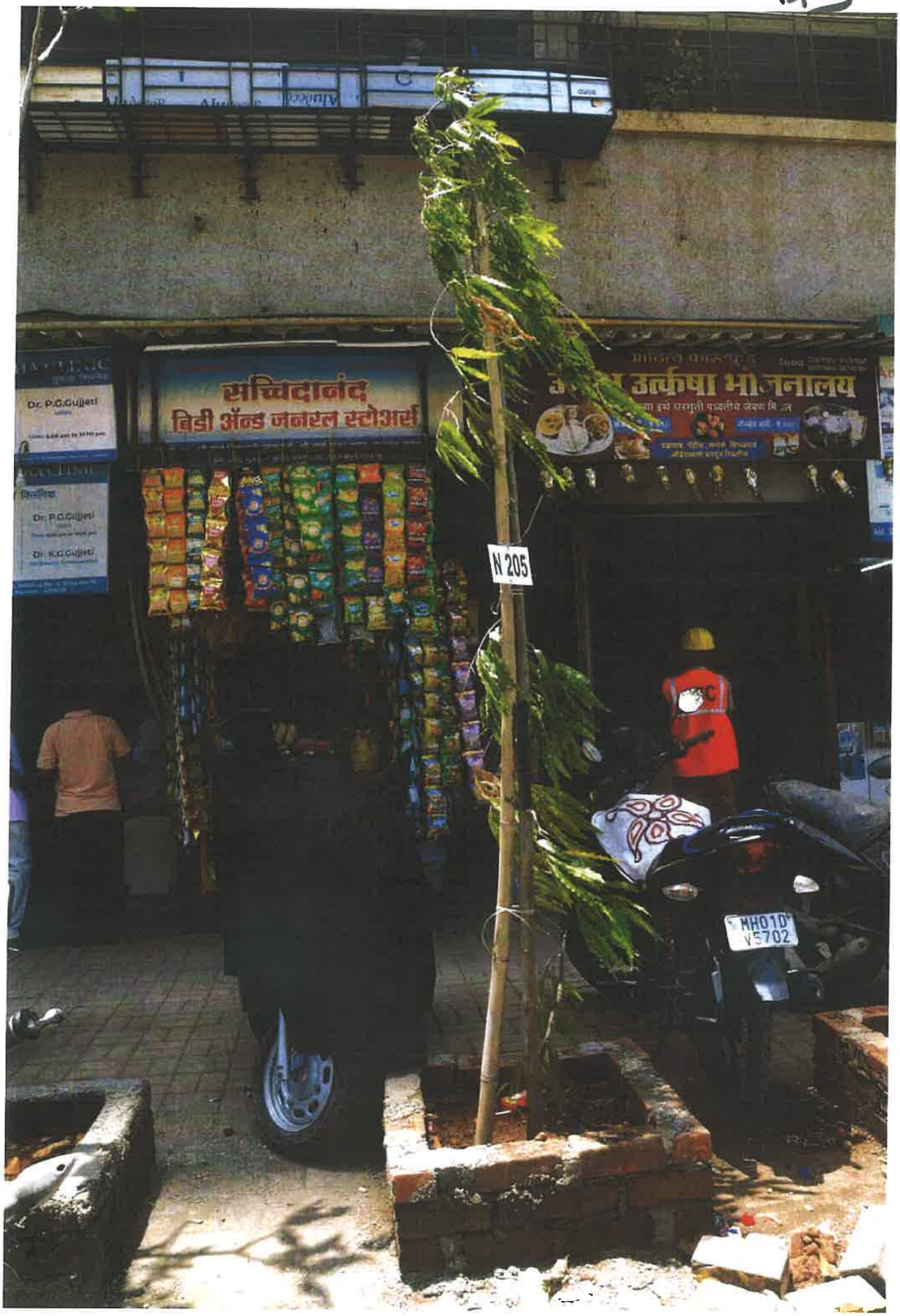
141



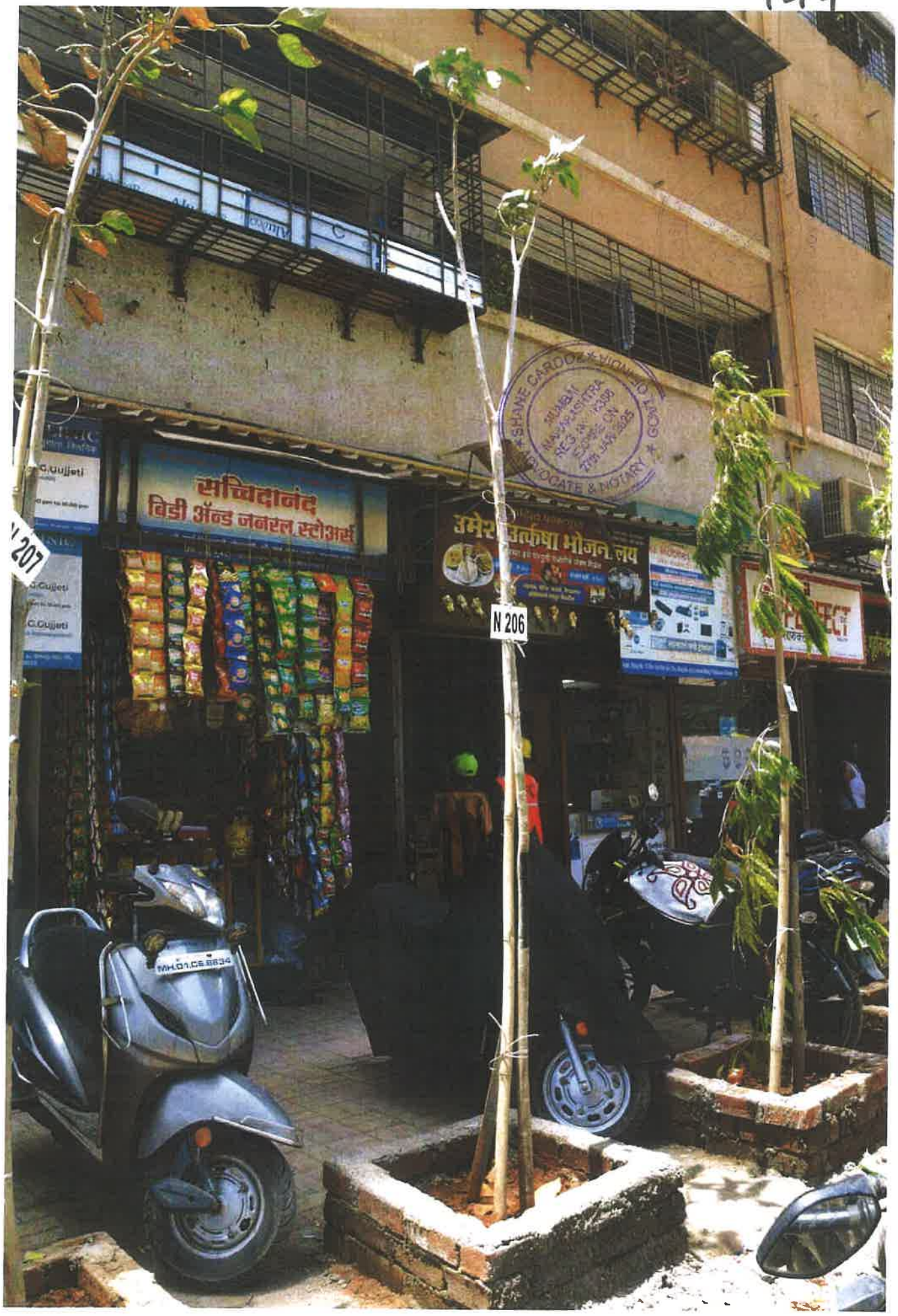
SHANE CARDOZ ★ GOVT. OF INDIA ★ ADVOCATE & NOTARY ★
MUMBAI
MAHARASHTRA
REG. No. 10388
EXPIRE ON
27th JAN 2025

147

143


सच्चिदानंद
बिडी अँन्ड जनरल स्टोअर्स
उत्कर्षा भोजनालय
Dr. P.C.Gujjeti
Dr. K.C.Gujjeti
N 205
MH01D
V5702

144



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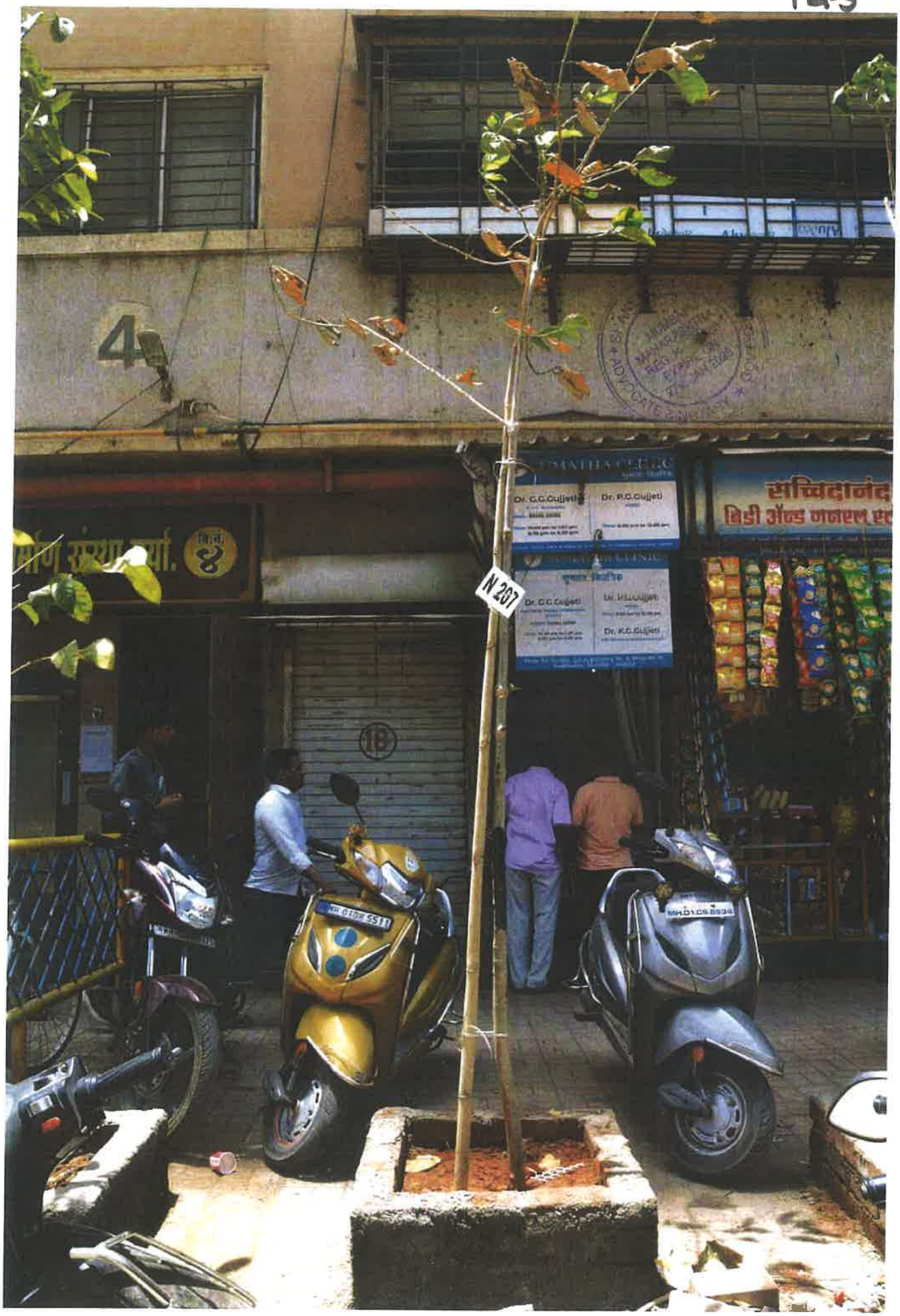
4
Dr. C.C.Guljeti
Dr. P.C.Guljeti
Dr. C.C.Guljeti
Dr. K.C.Guljeti
सच्चिदानंद
बिडी अँण्ड जनरल स्टो
N 267
18

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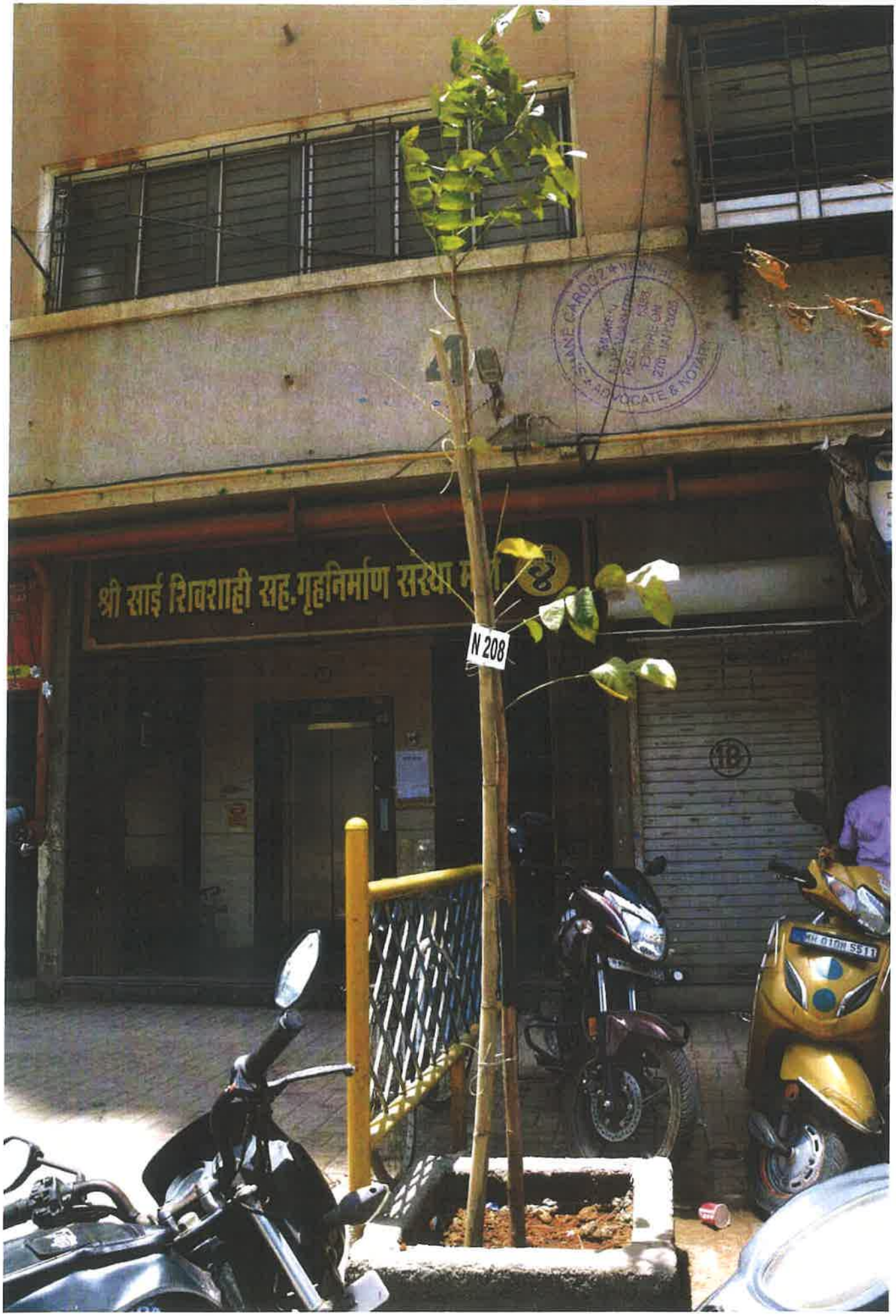

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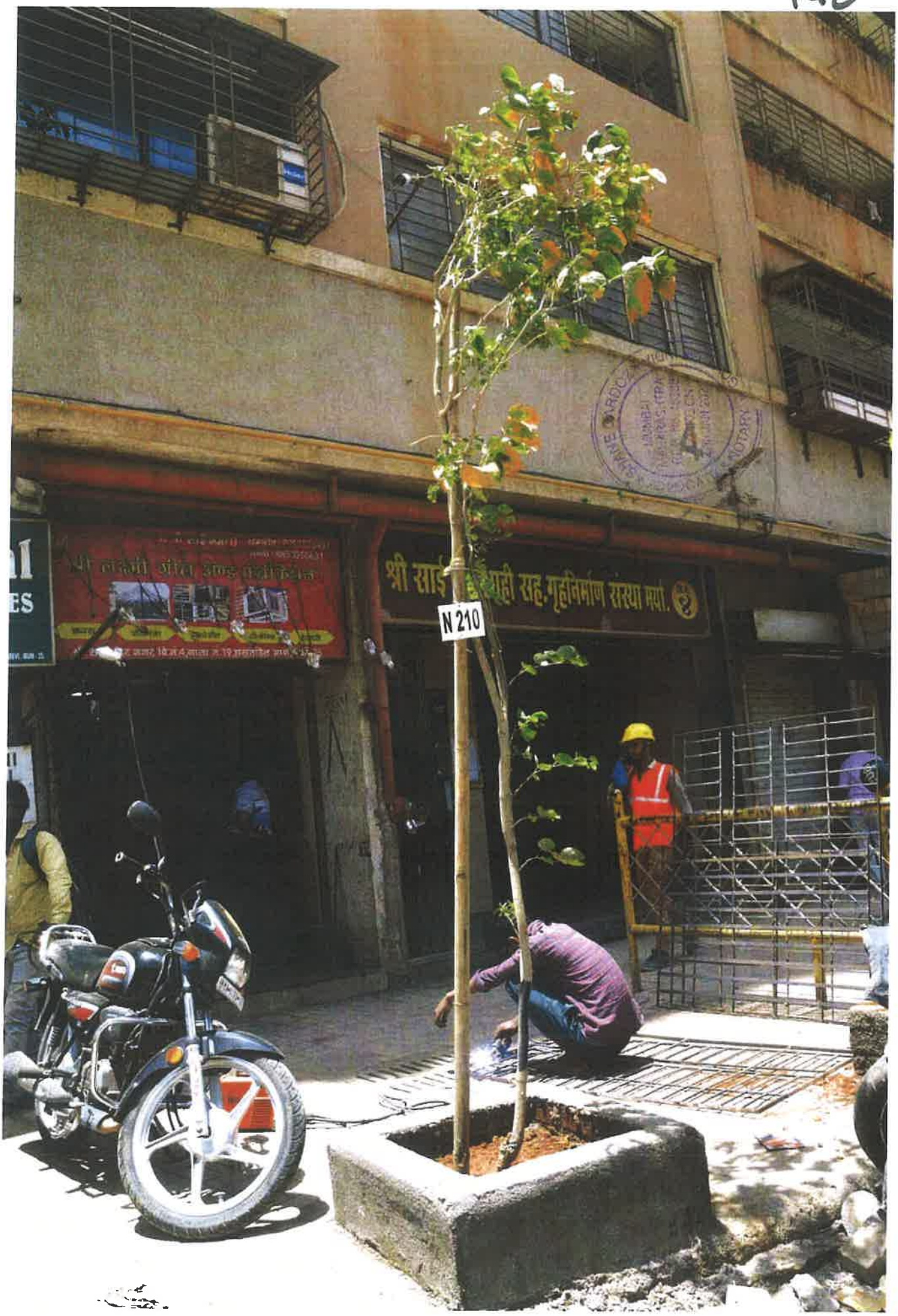

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N 211
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SHANE CARDOZ ★ ADVOCATE & NOTARY ★ GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. NO. 10389
EXPIRE ON
27th JAN 2025

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N 69
SHANE GARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
EXPIRE ON
MH. -01.BB5681
MGK71

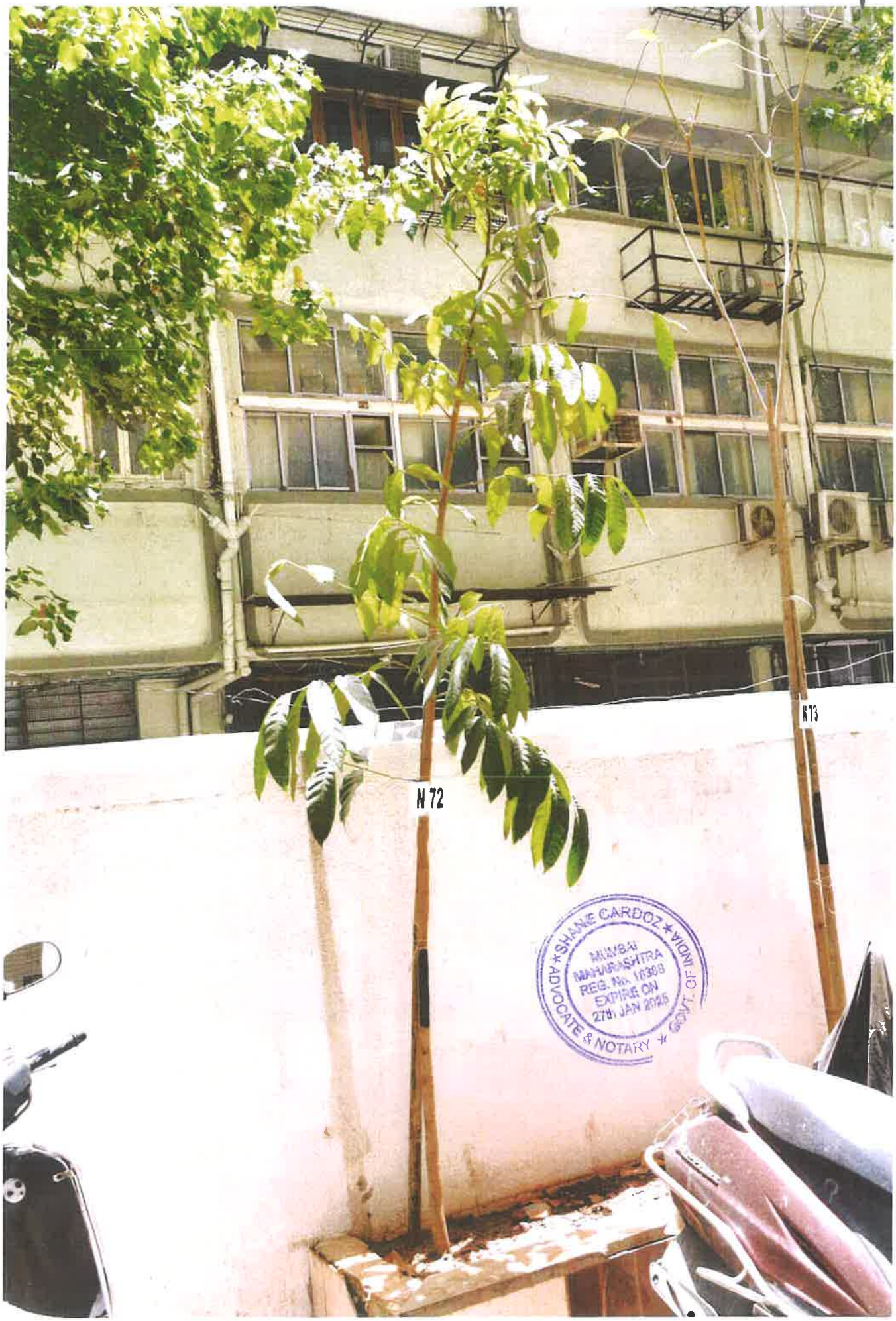
157

N 69
N 70
SHANE CARDOZ
MUMBAI
MAHARASHTRA
EXPIRE ON
NOTARY
GOVT. OF INDIA

158

N71
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. NO. 12088
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA
NOTARY

159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SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16369
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

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N 72
N 73
SHANE CARDOZ
ADVOCATE & NOTARY
GOVT. OF INDIA
MUMBAI
MAHARASHTRA
REG. No. 16398
EXPIRE ON
27th JAN 2025

161

N 73
N 74
N 75
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 18388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

162

N 74
N 75
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No 18388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

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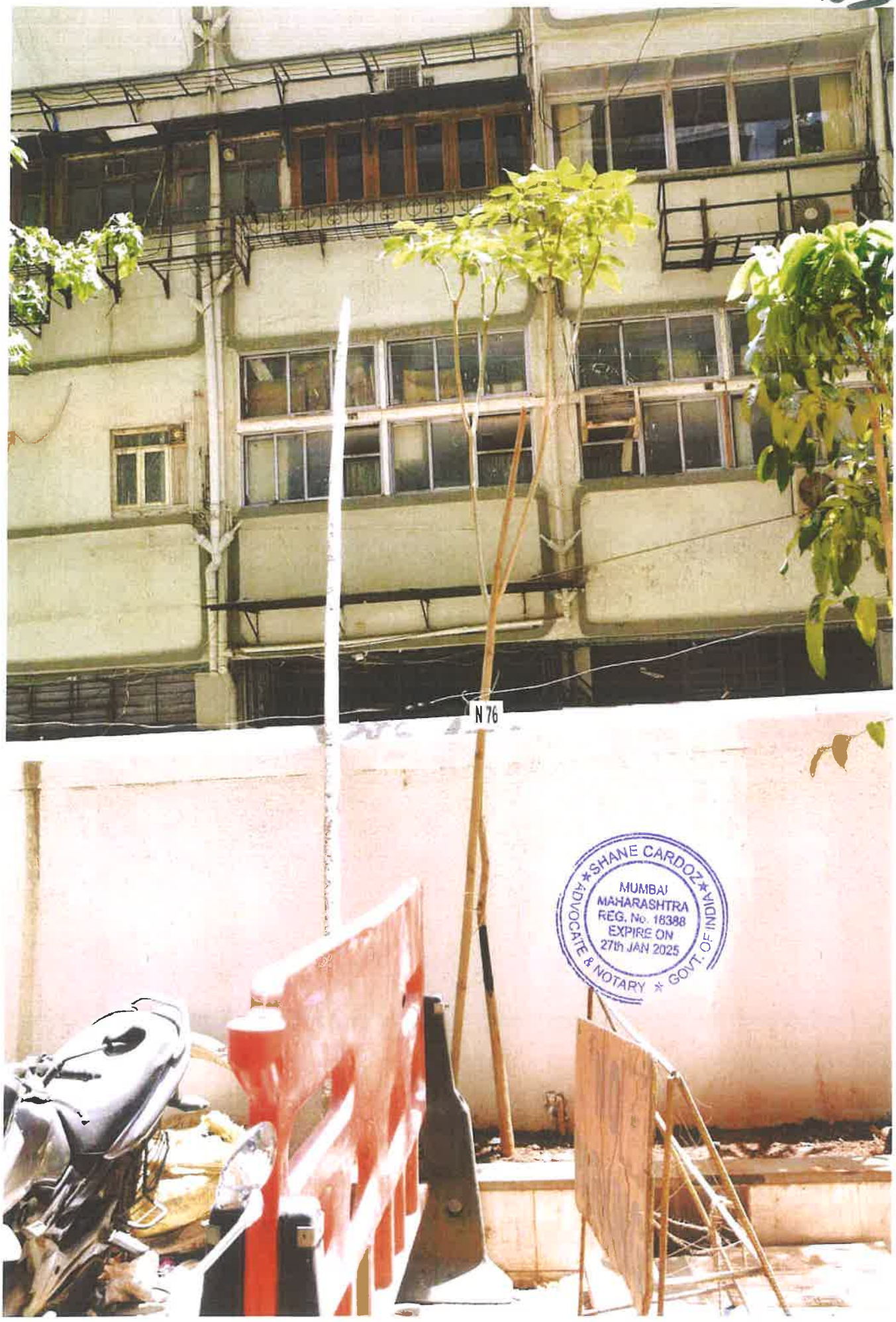
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SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

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N 76
N 77
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16393
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

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N 78
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16388
EXPIRE ON
27th JAN 2025
ADVOCATE & NOTARY
GOVT. OF INDIA

166

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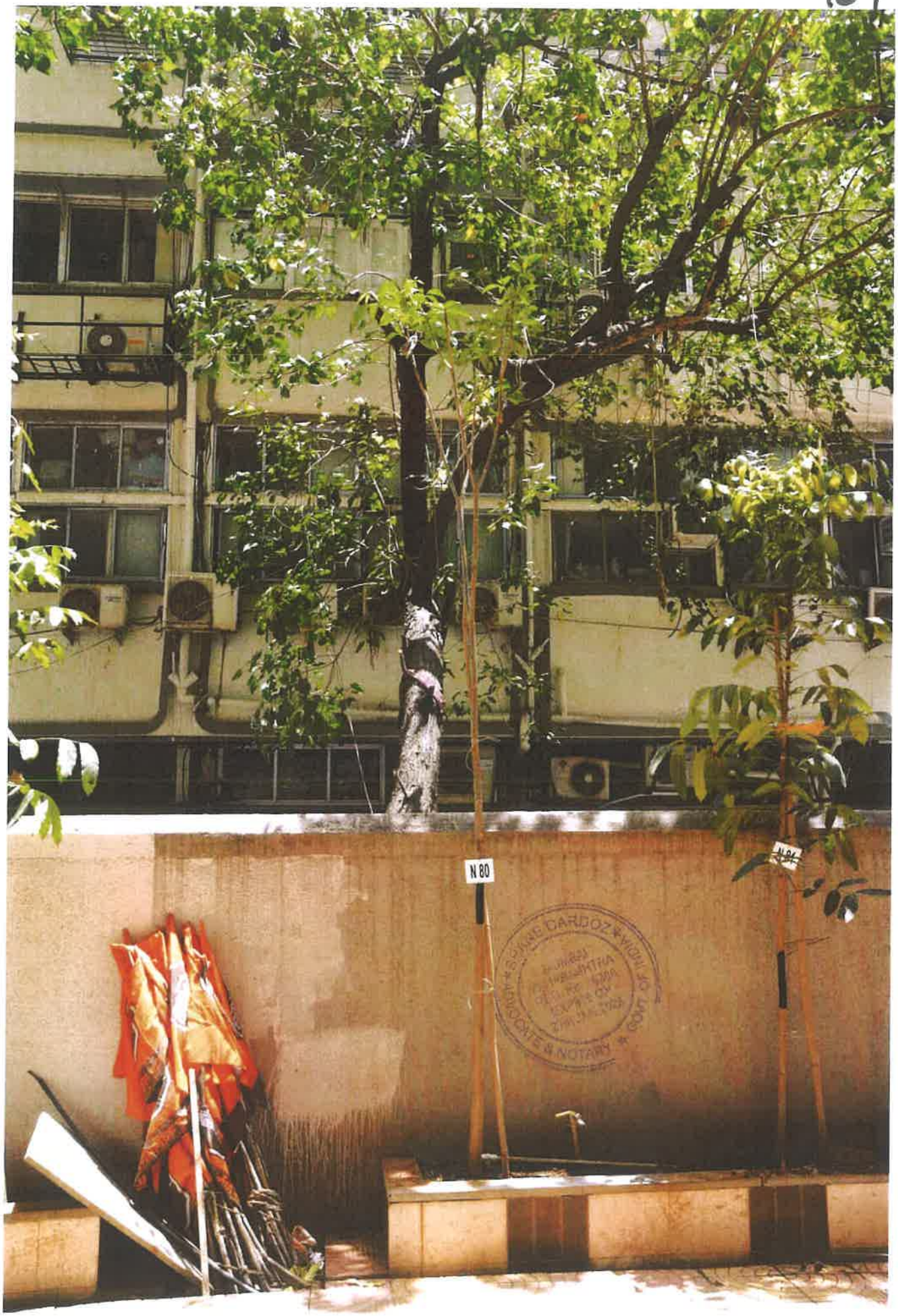

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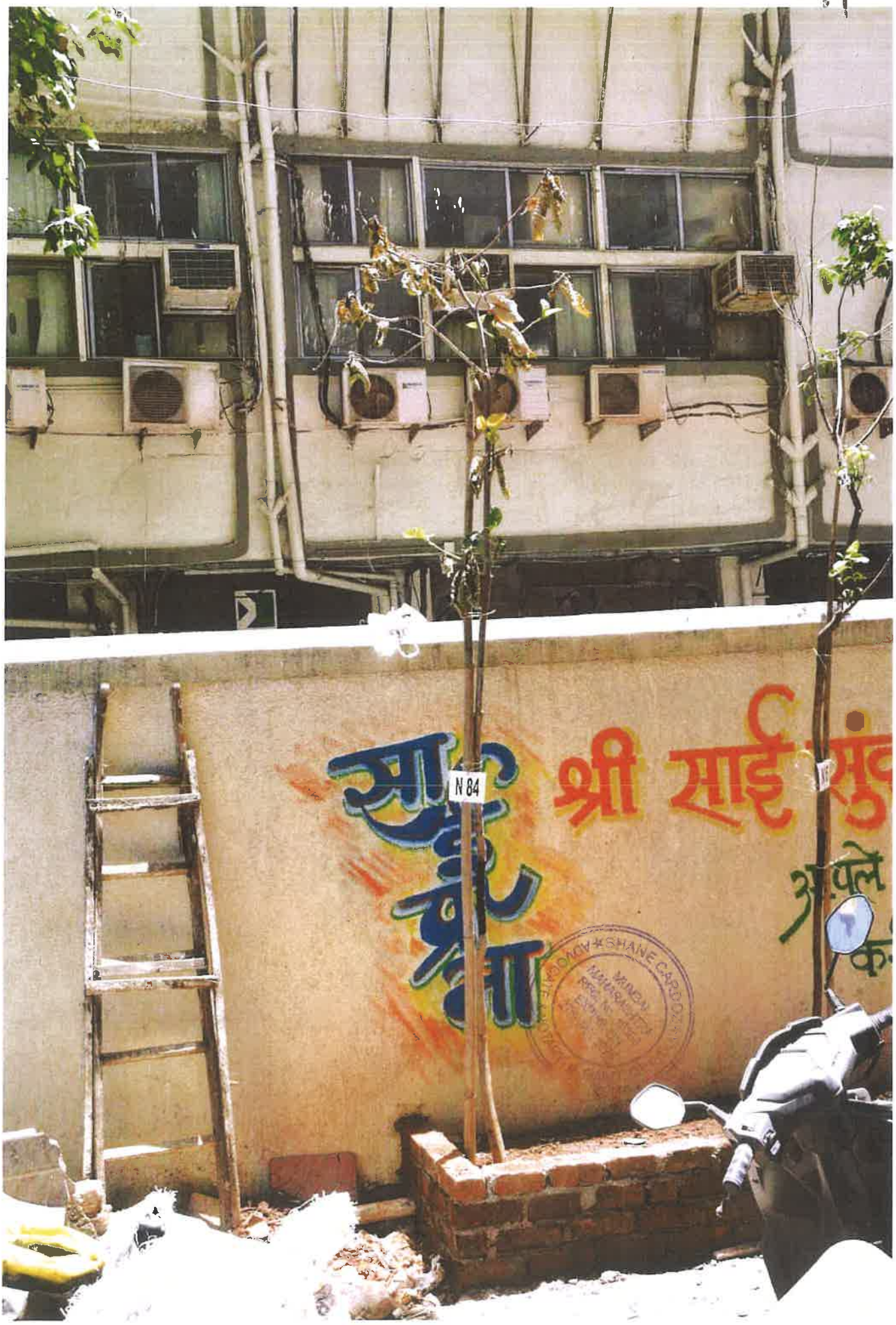

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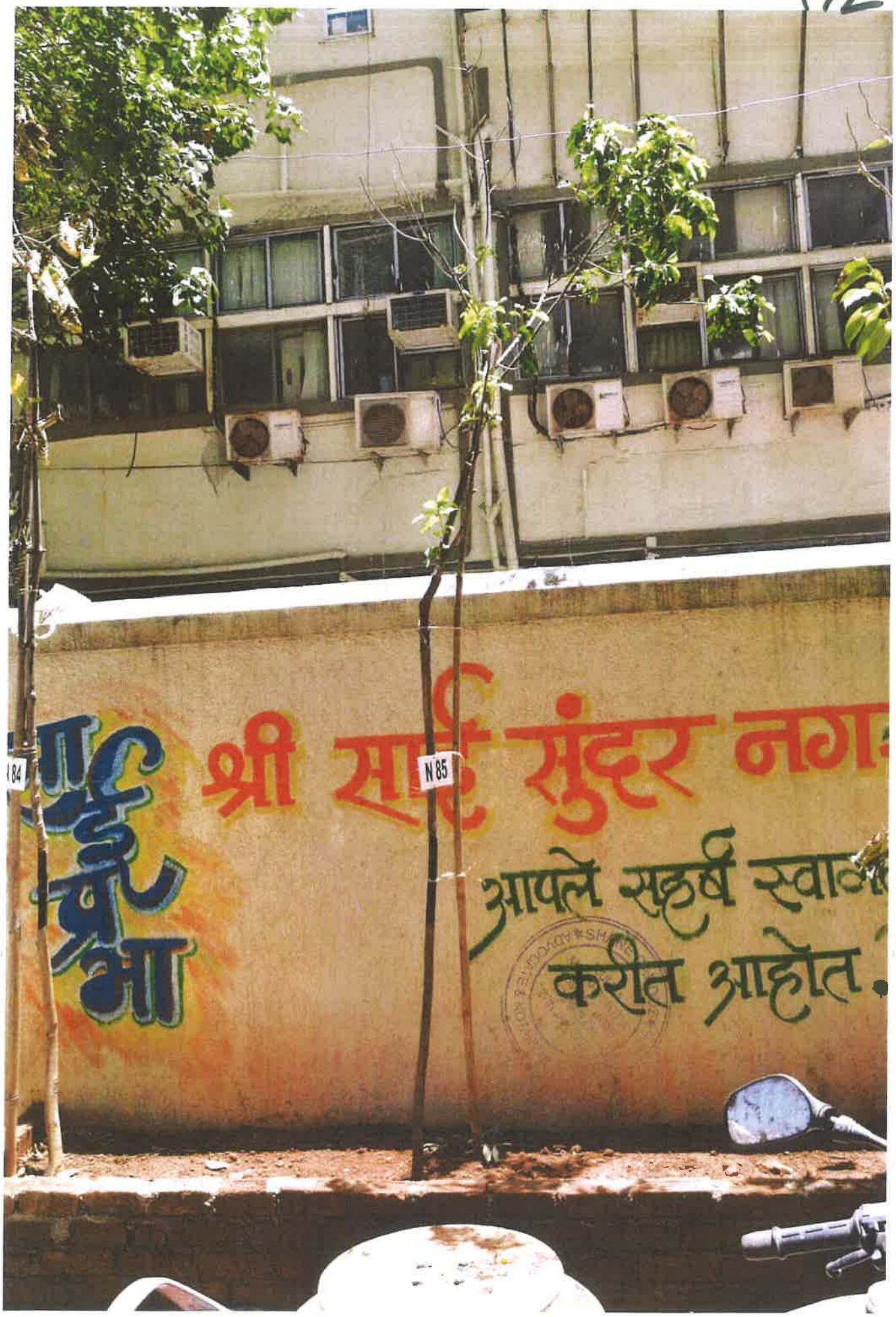

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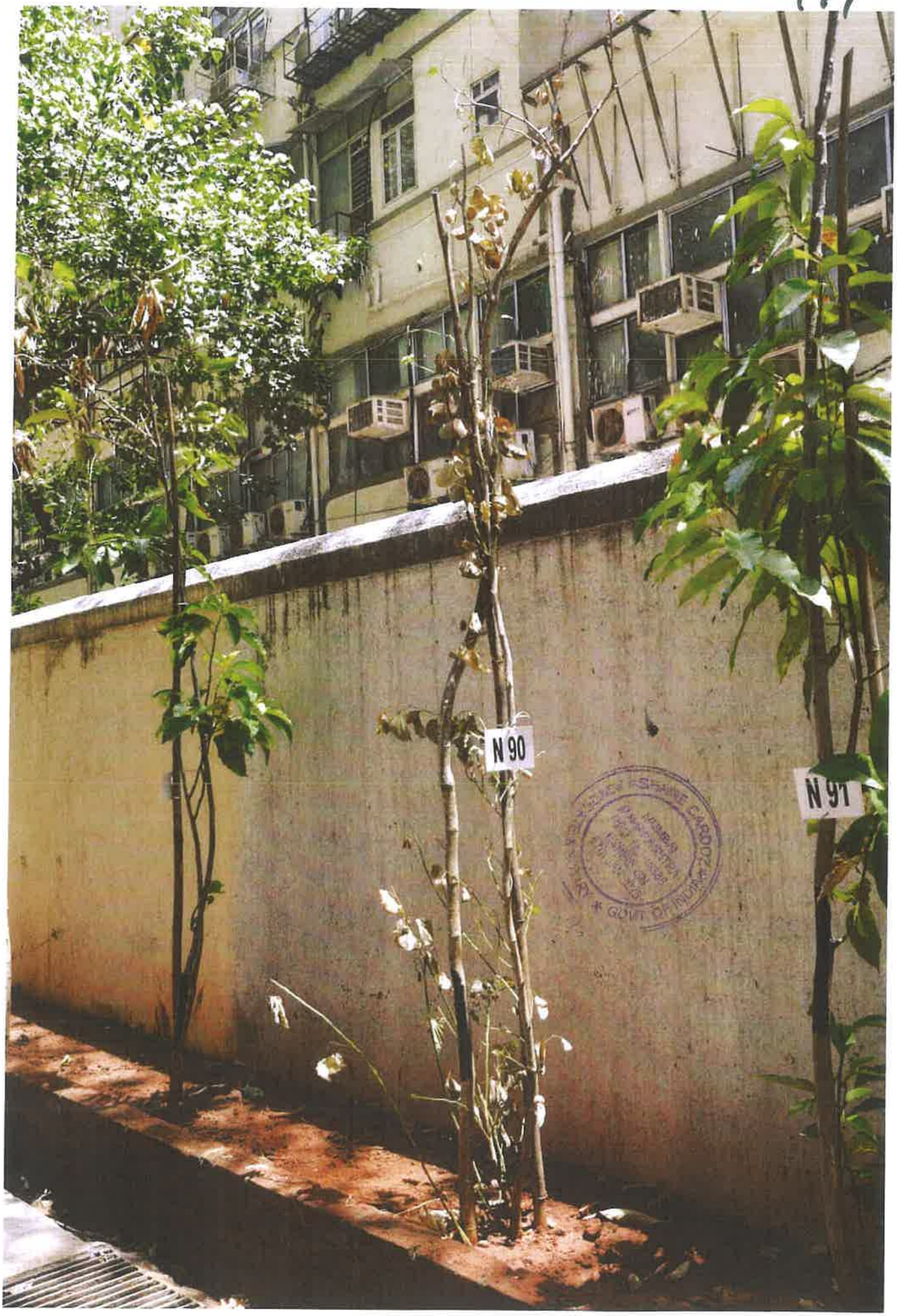

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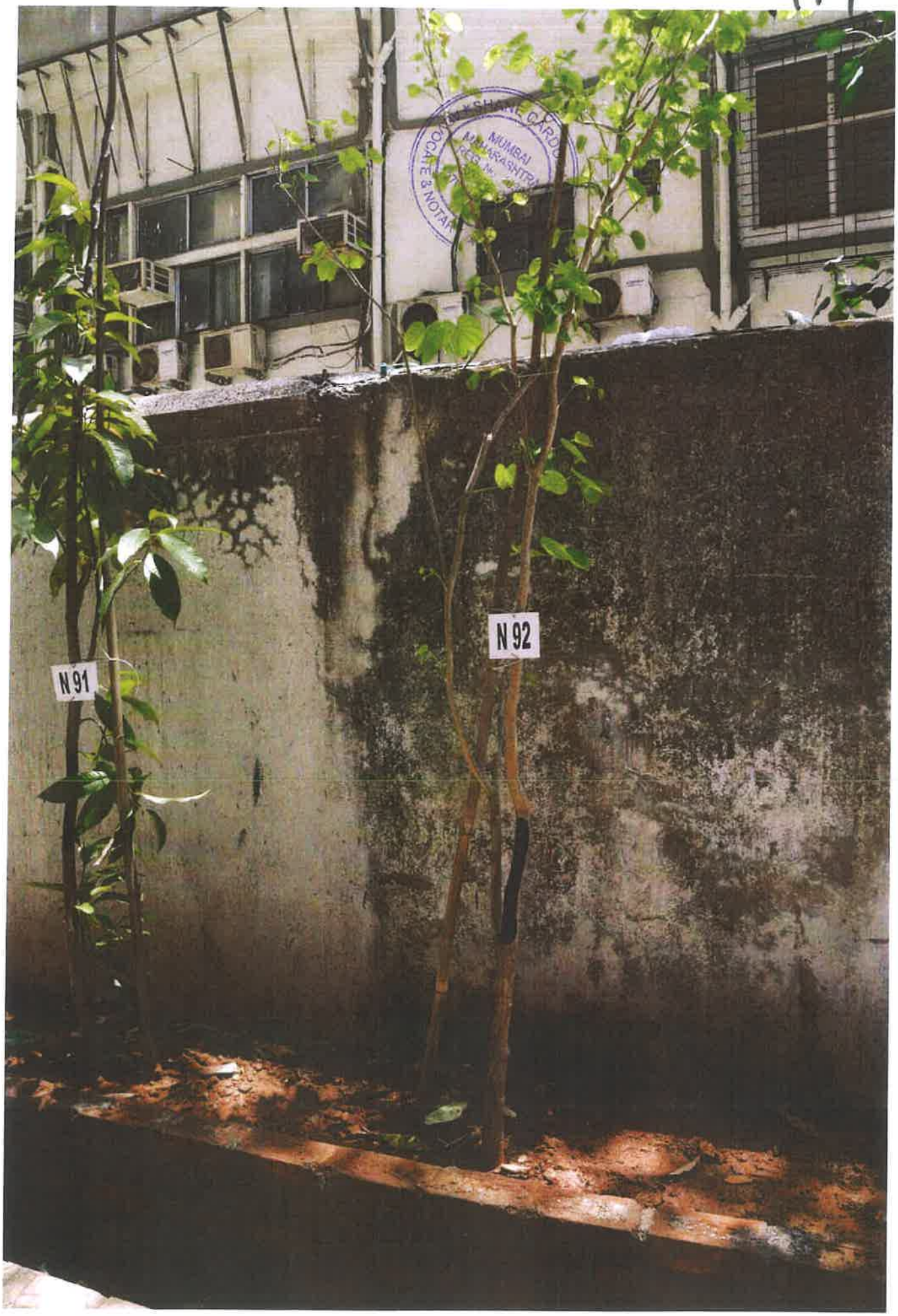

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N 101
SHANTI CARDOZ
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA
GOVT. OF INDIA

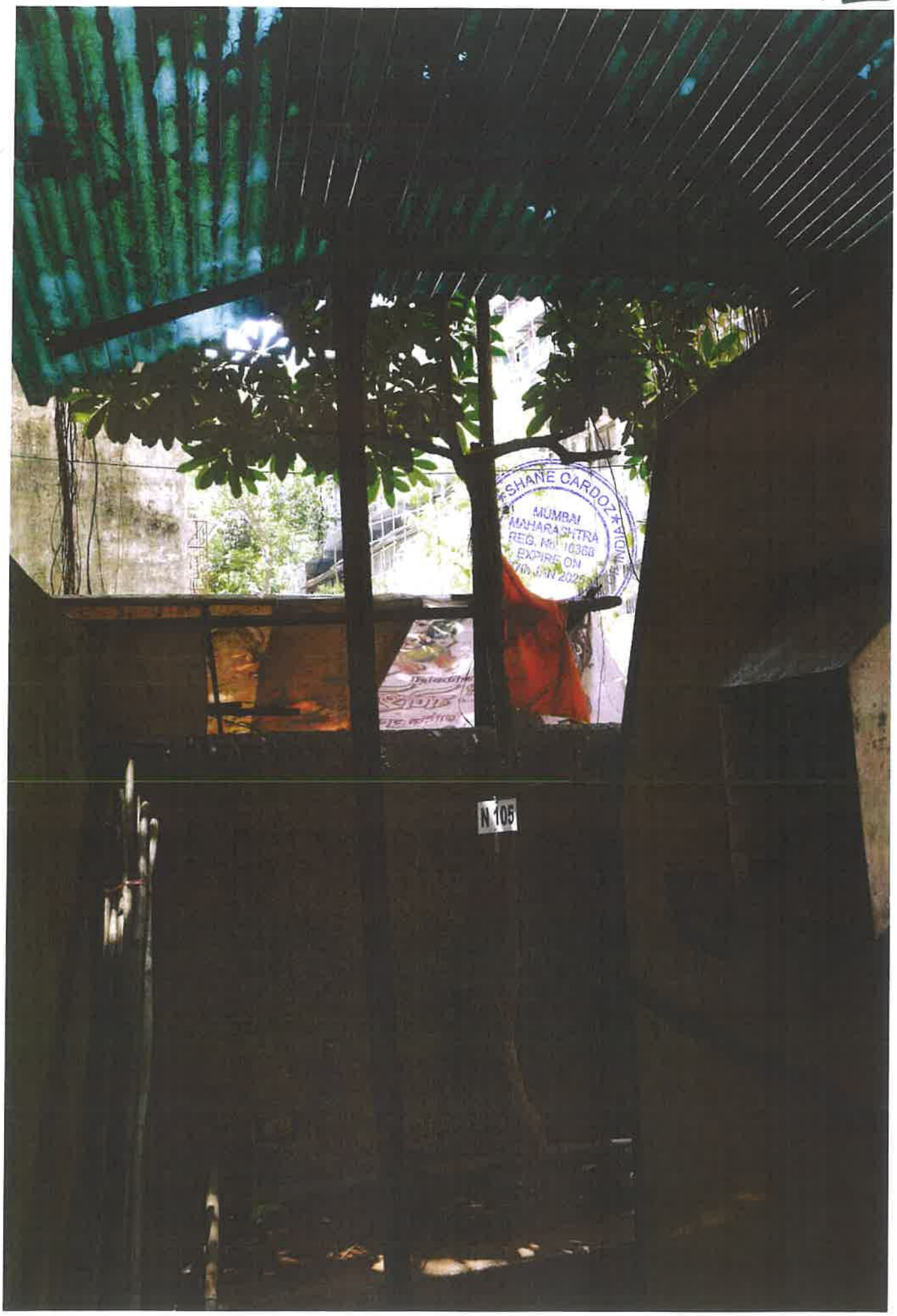
189

190

191

N 102
N 103
N 104
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 16368
EXPIRE ON
27th JAN 2026
ADVOCATE & NOTARY * GOVT. OF INDIA

192


SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 10366
EXPIRE ON
N 105

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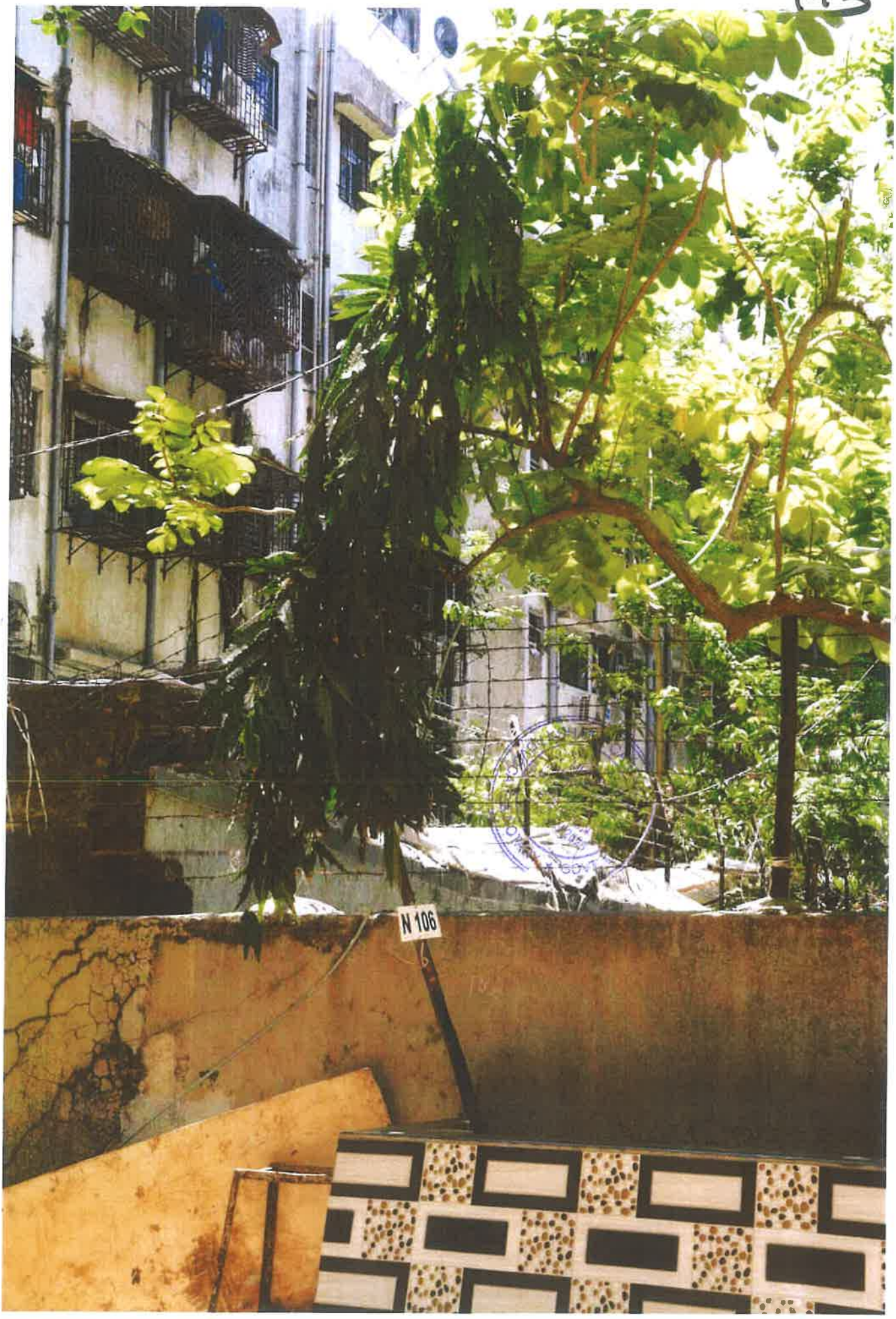

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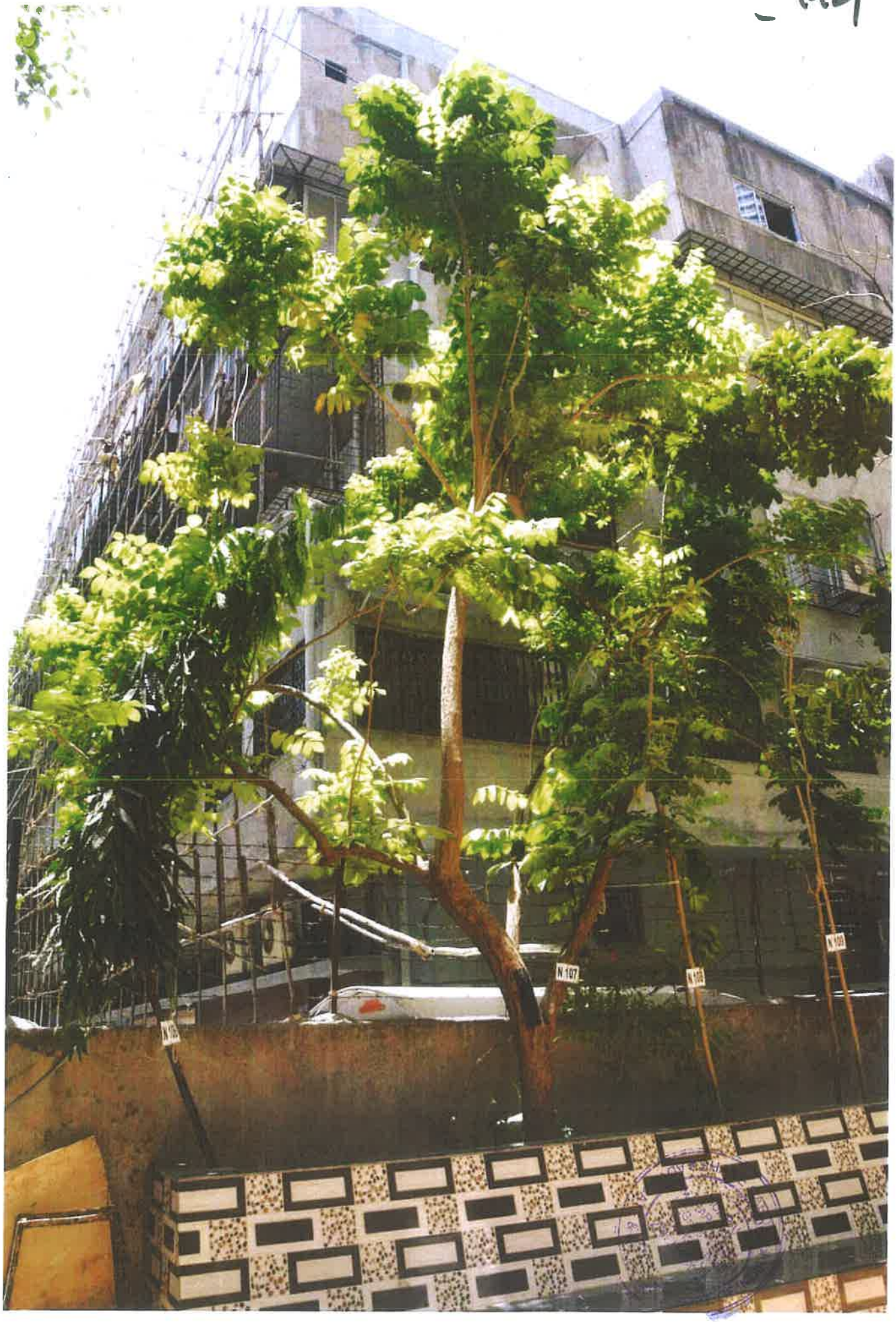

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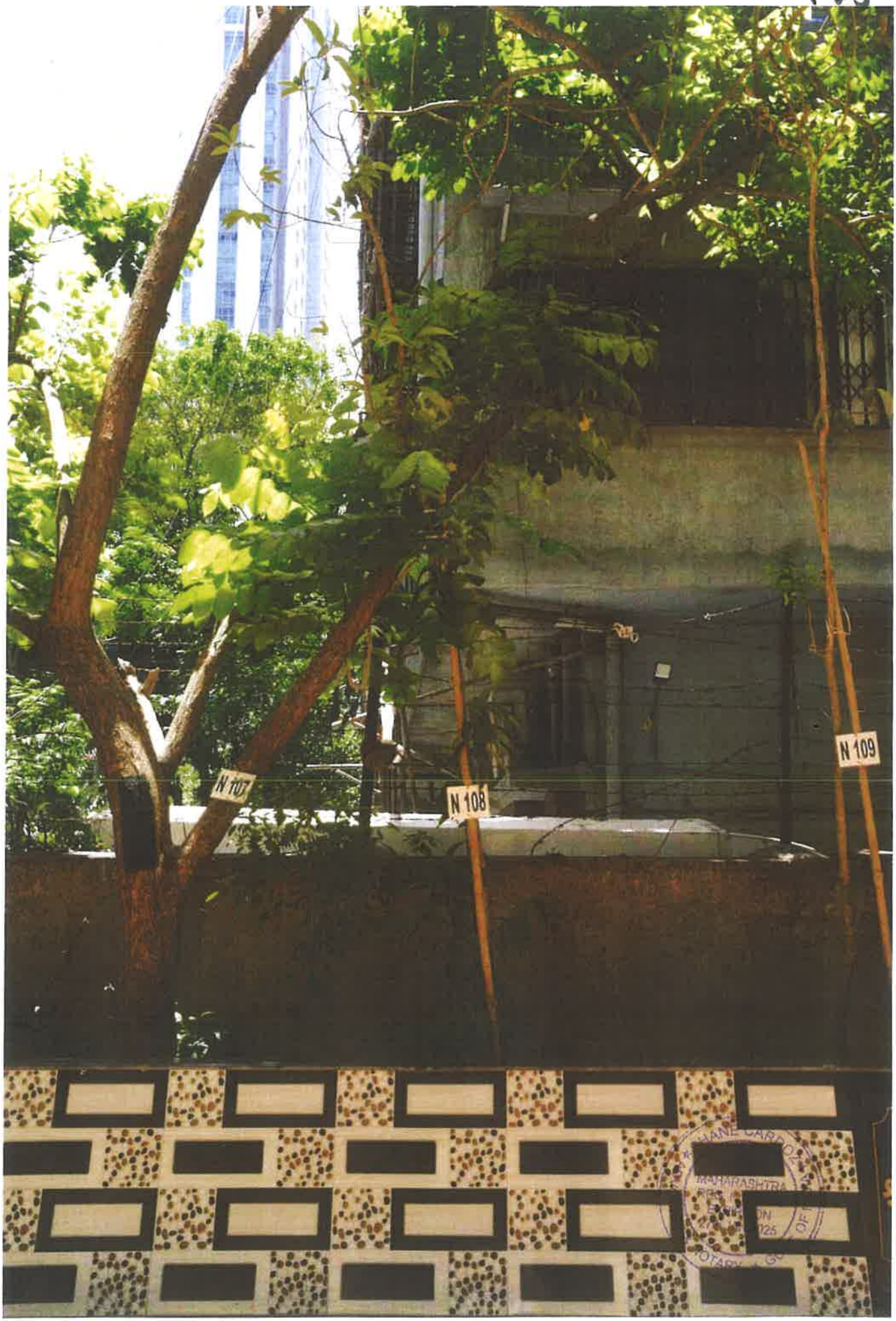

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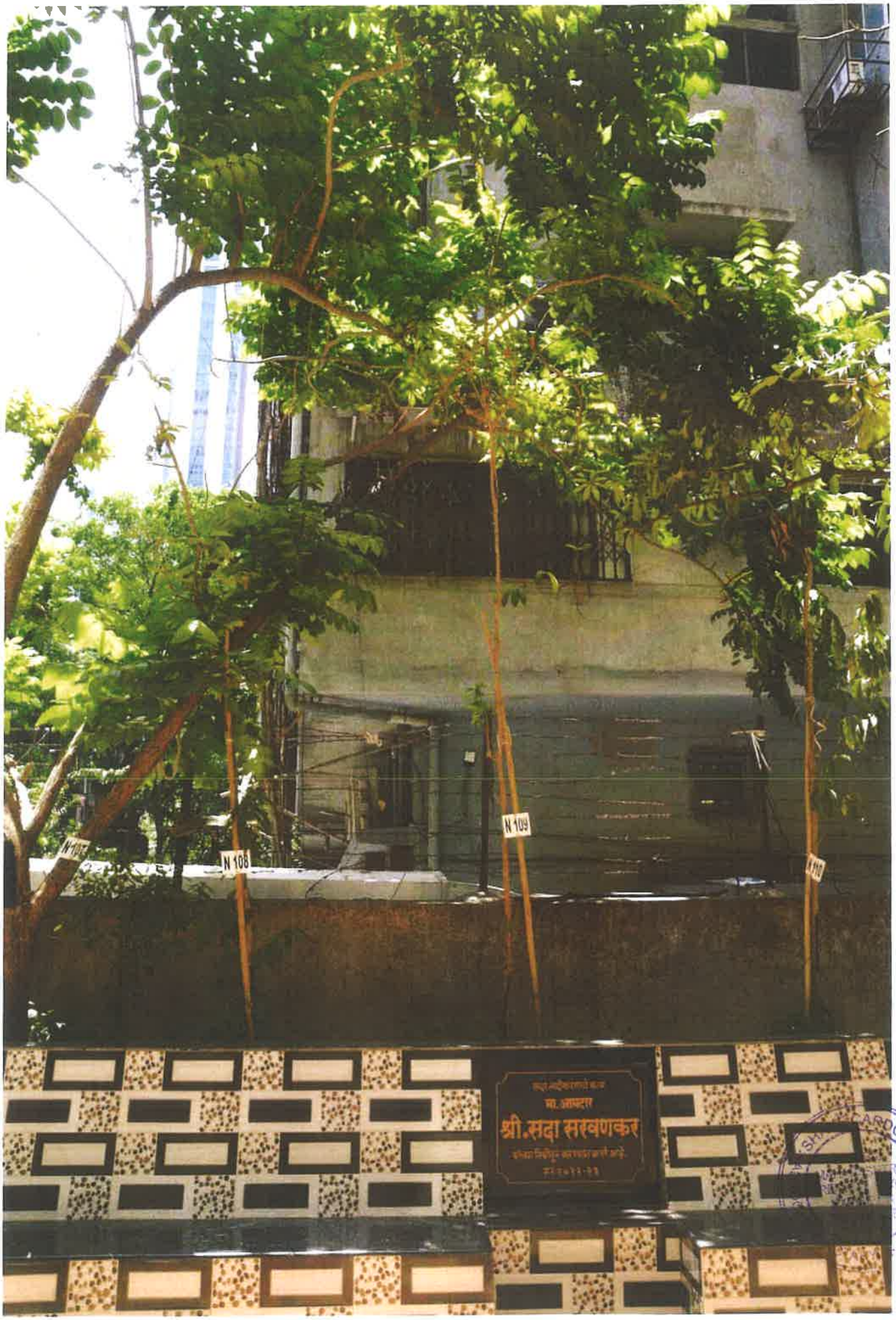

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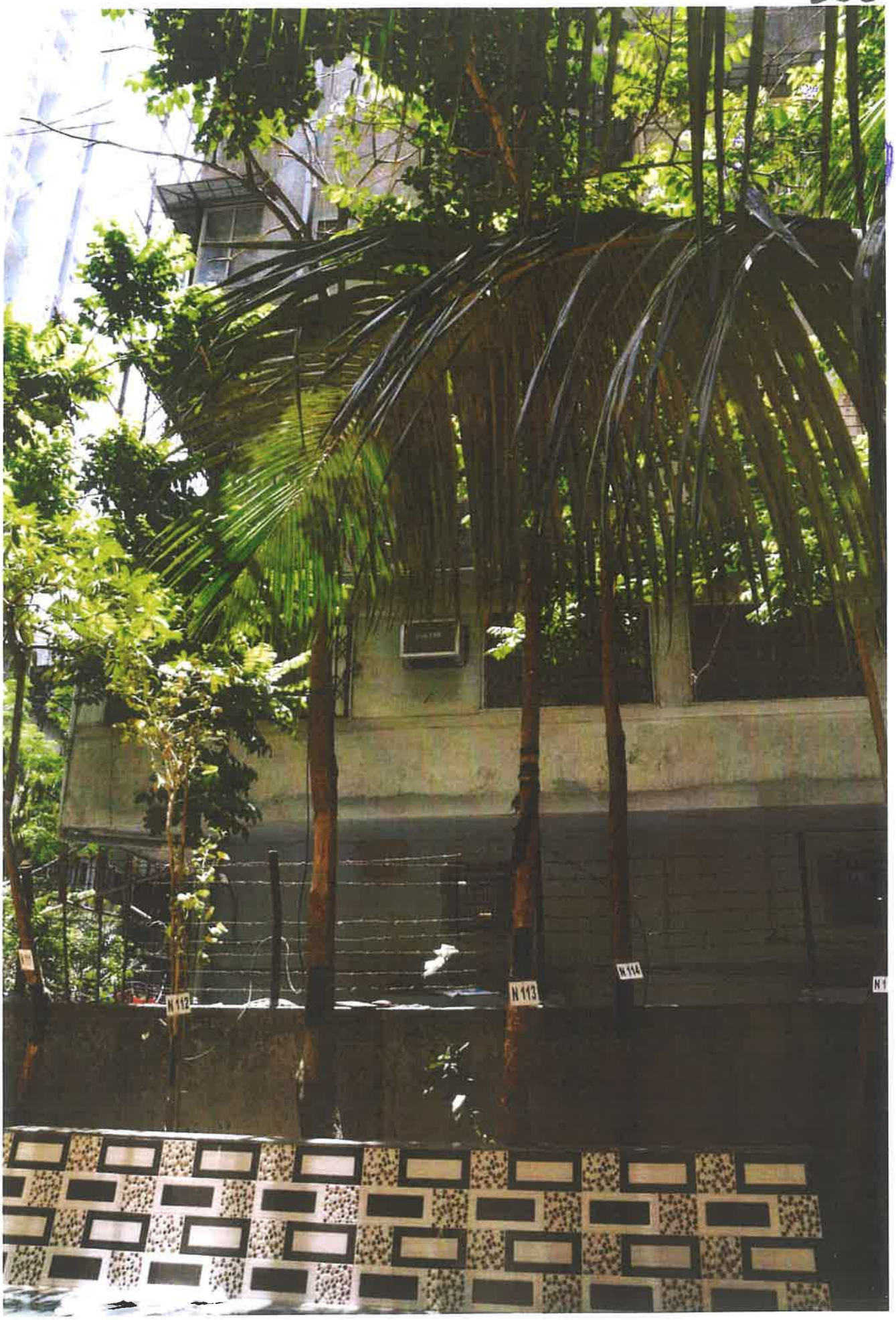

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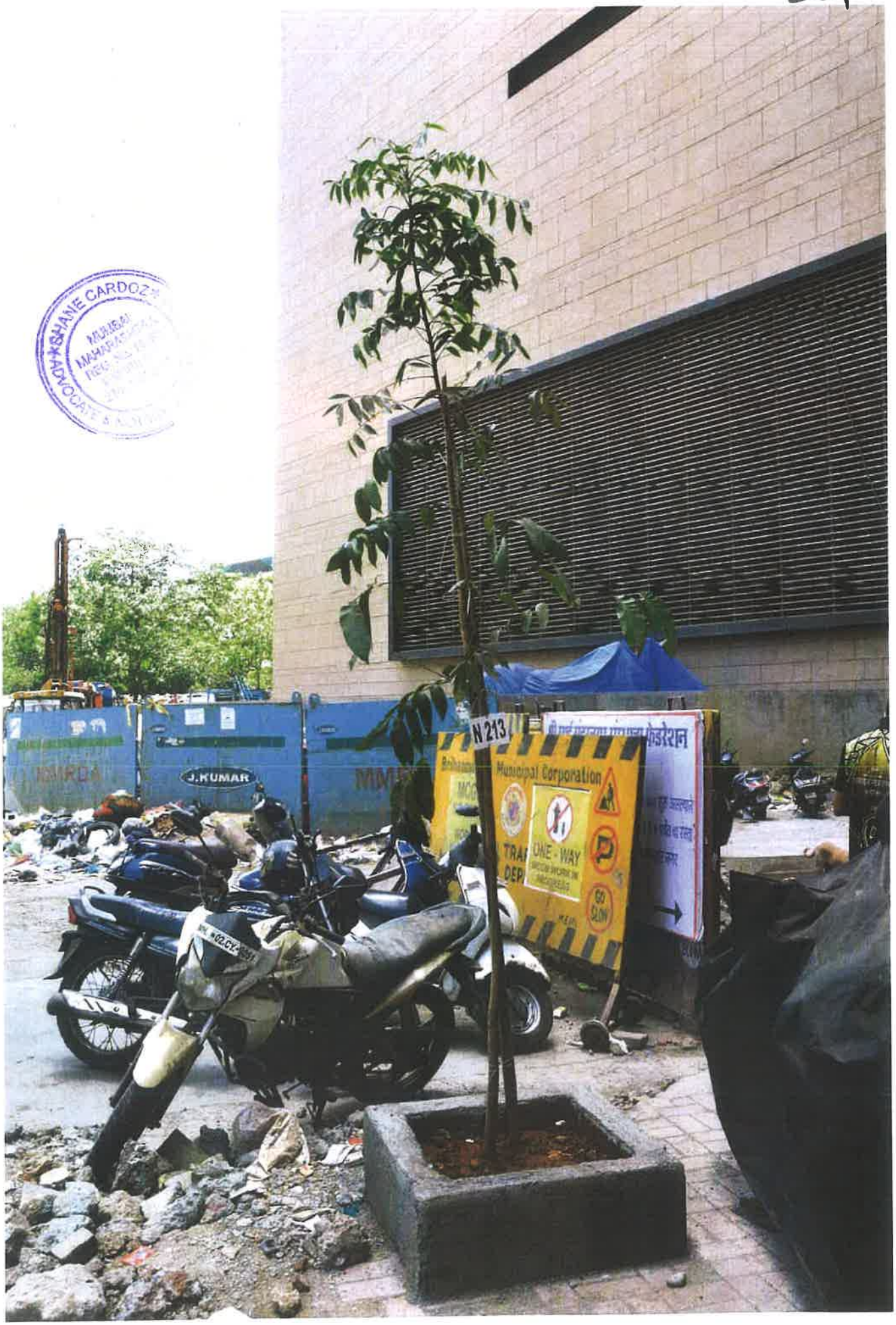
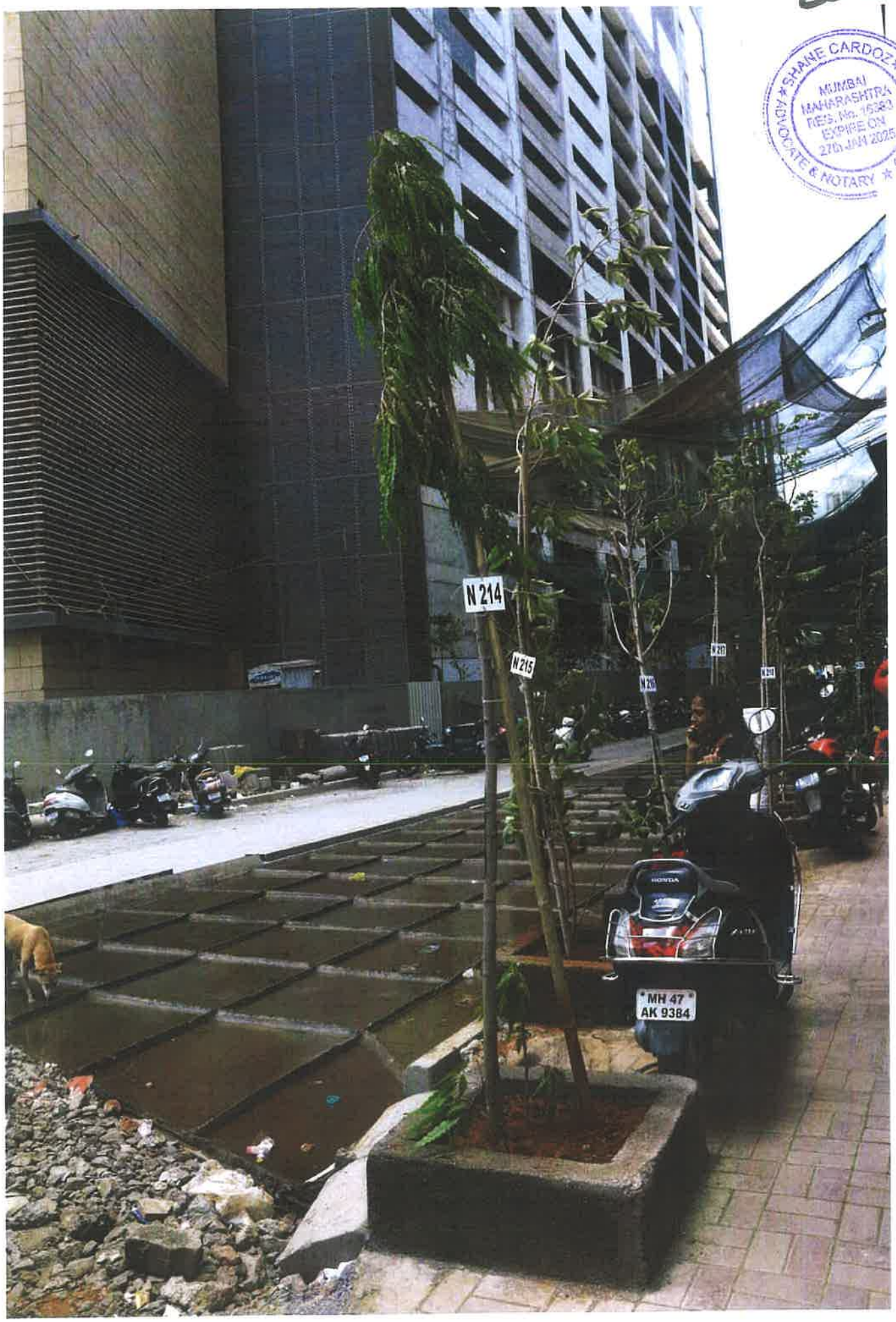


SHANE CARDOZA
ADVOCATE & NOTARY
MUMBAI
MAHARASHTRA

202



SHANE CARDOZ ADVOCATE & NOTARY GOVT. OF INDIA
MUMBAI MAHARASHTRA
REG. No. 16383
EXPIRE ON
27th JAN 2025

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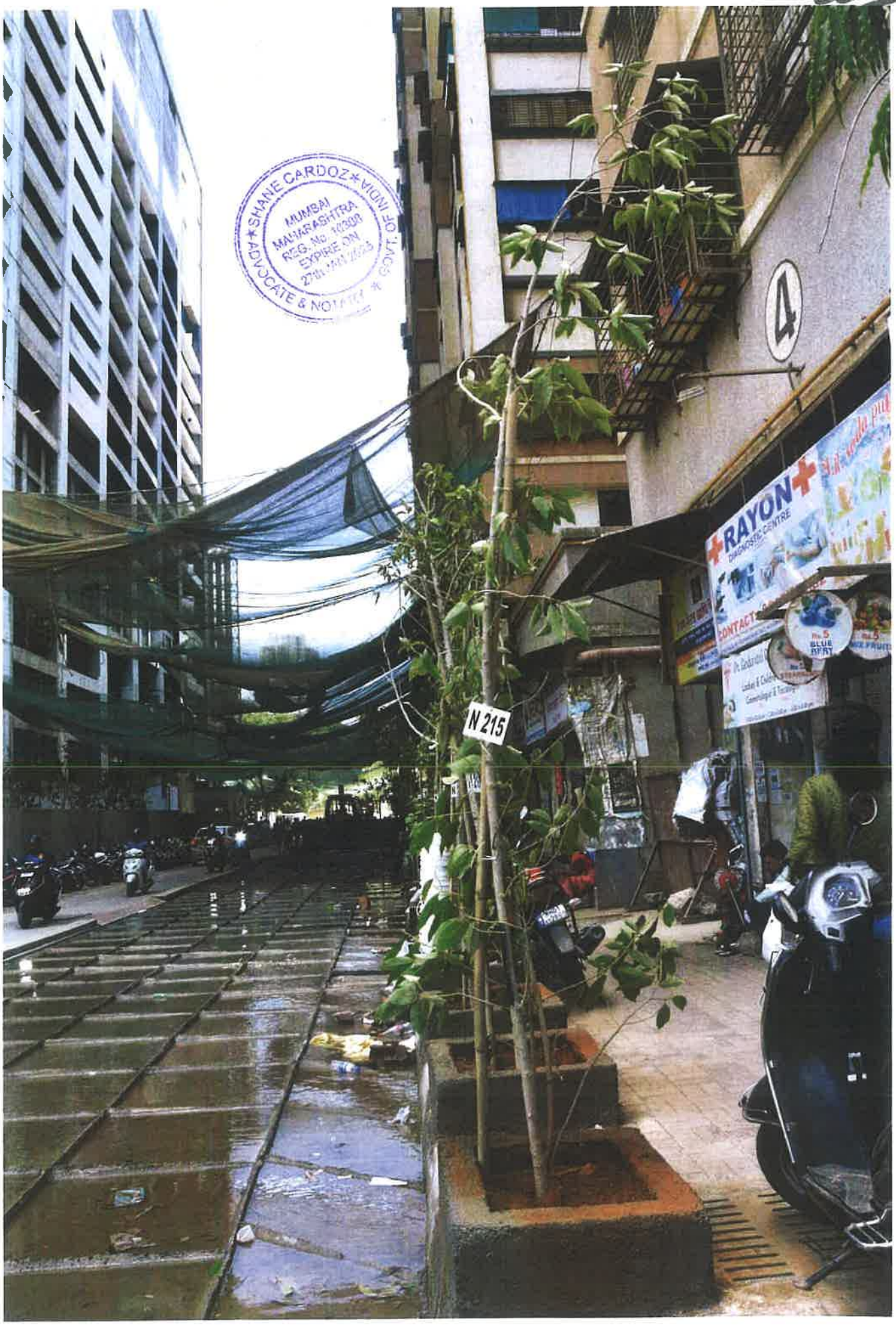
SHANE CARDOZ
MUMBAI
MAHARASHTRA
REG. No. 10308
EXPIRE ON
ADVOCATE & NOTARY
GOVT. OF INDIA
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CONTACT
BLUE BEAT
N 215

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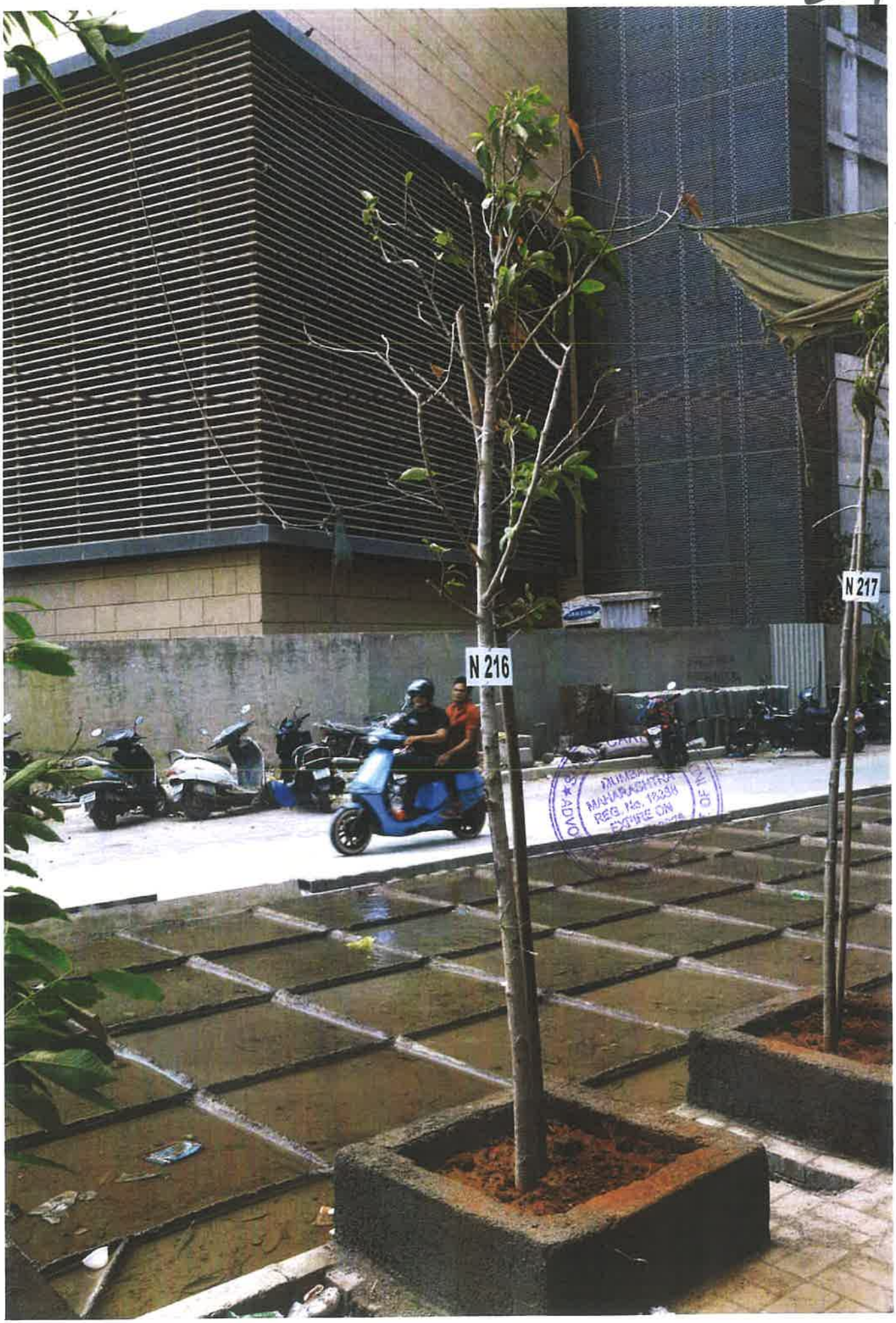

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SHANE CARDOZA
MUMBAI
MAHARASHTRA
REG. No: 18328
EXPIRE ON
27th JAN 2025
GOVT. OF INDIA

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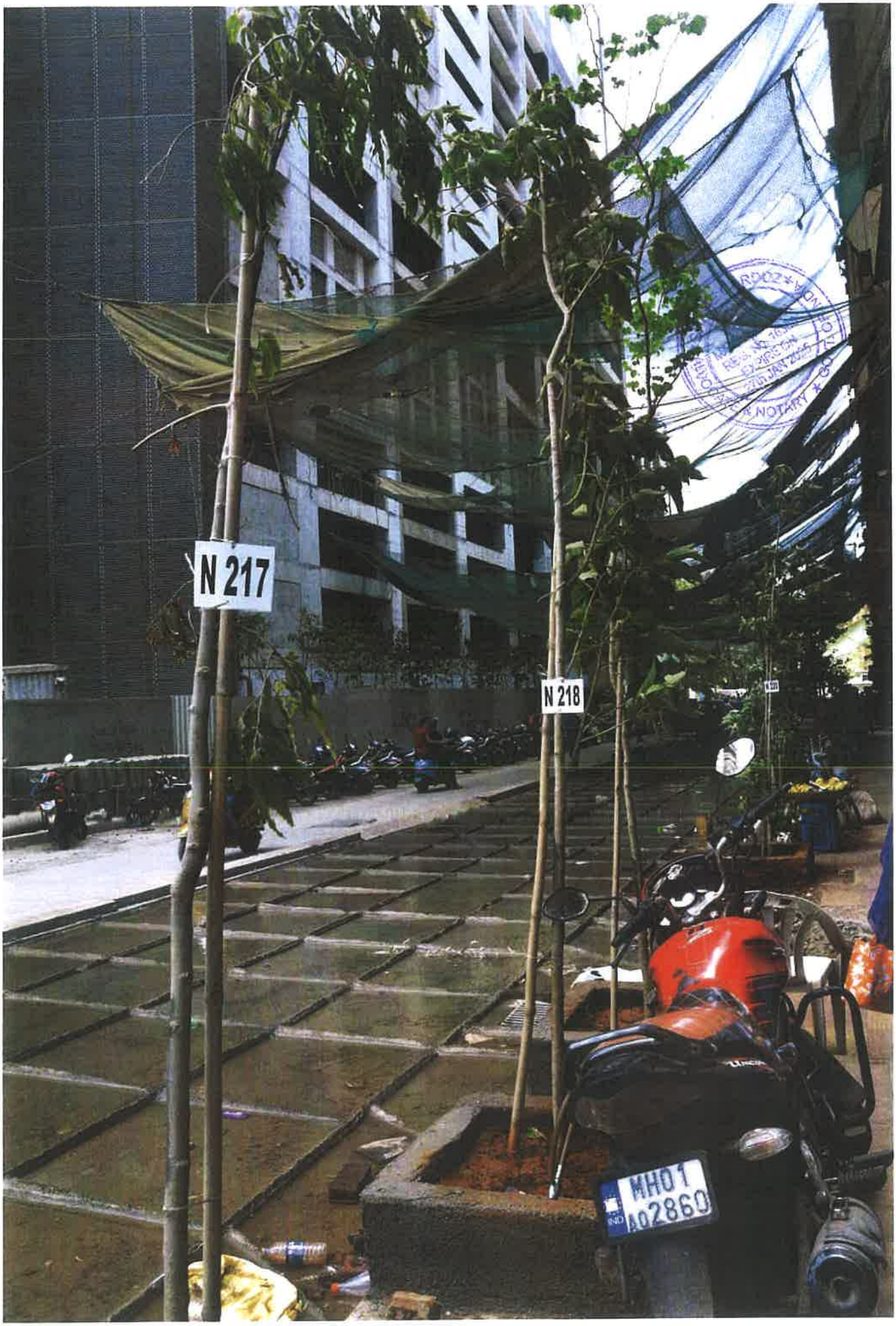

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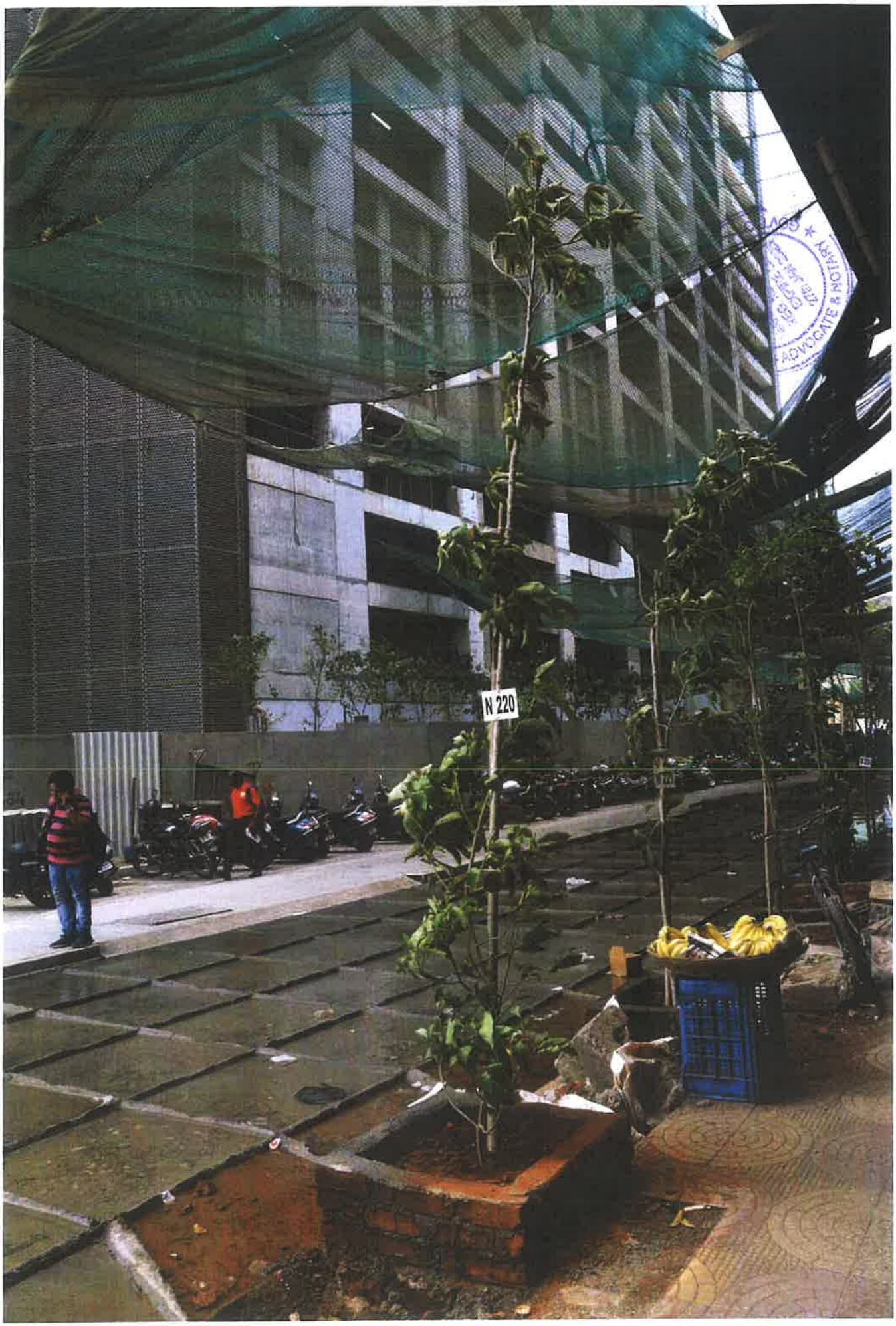

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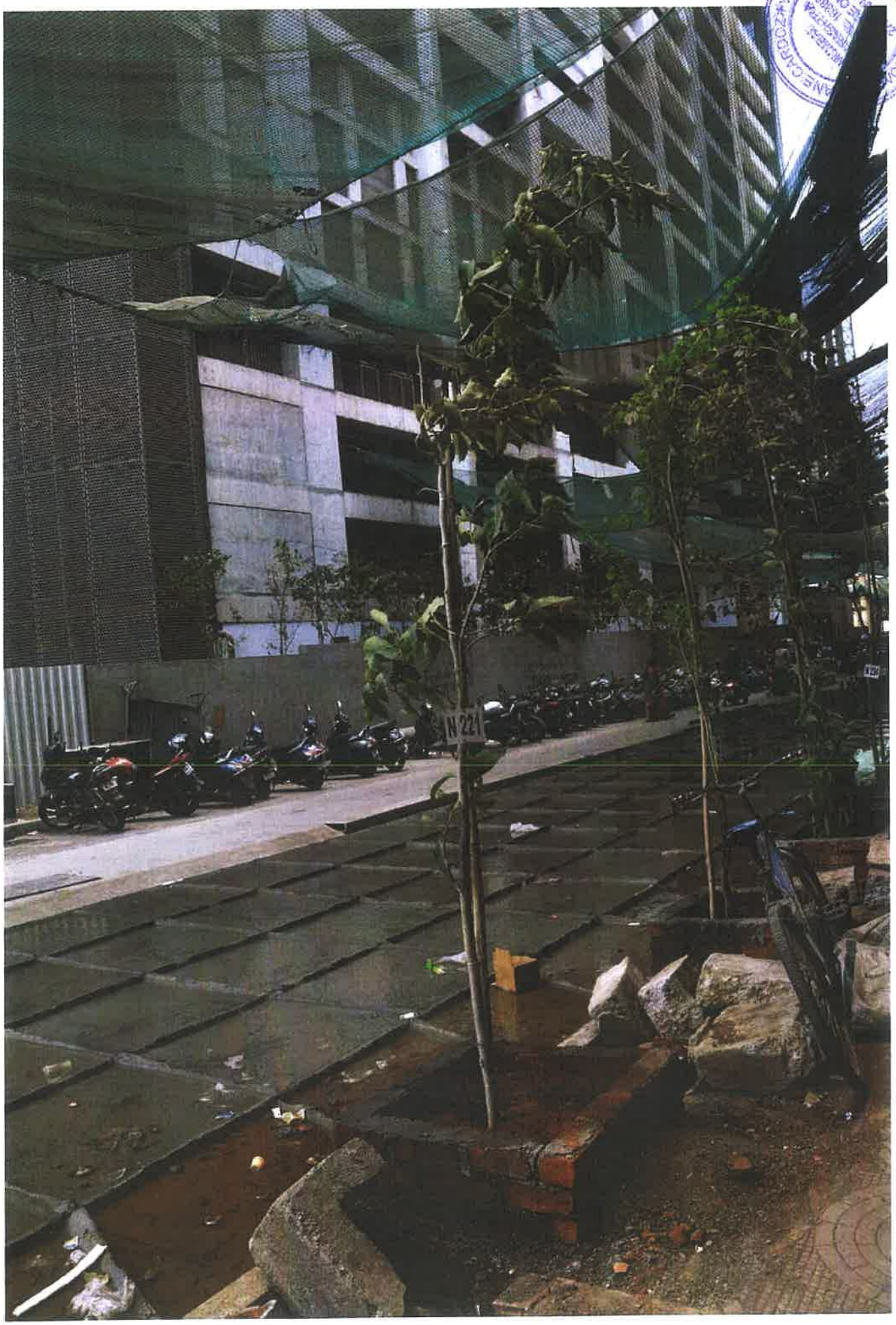

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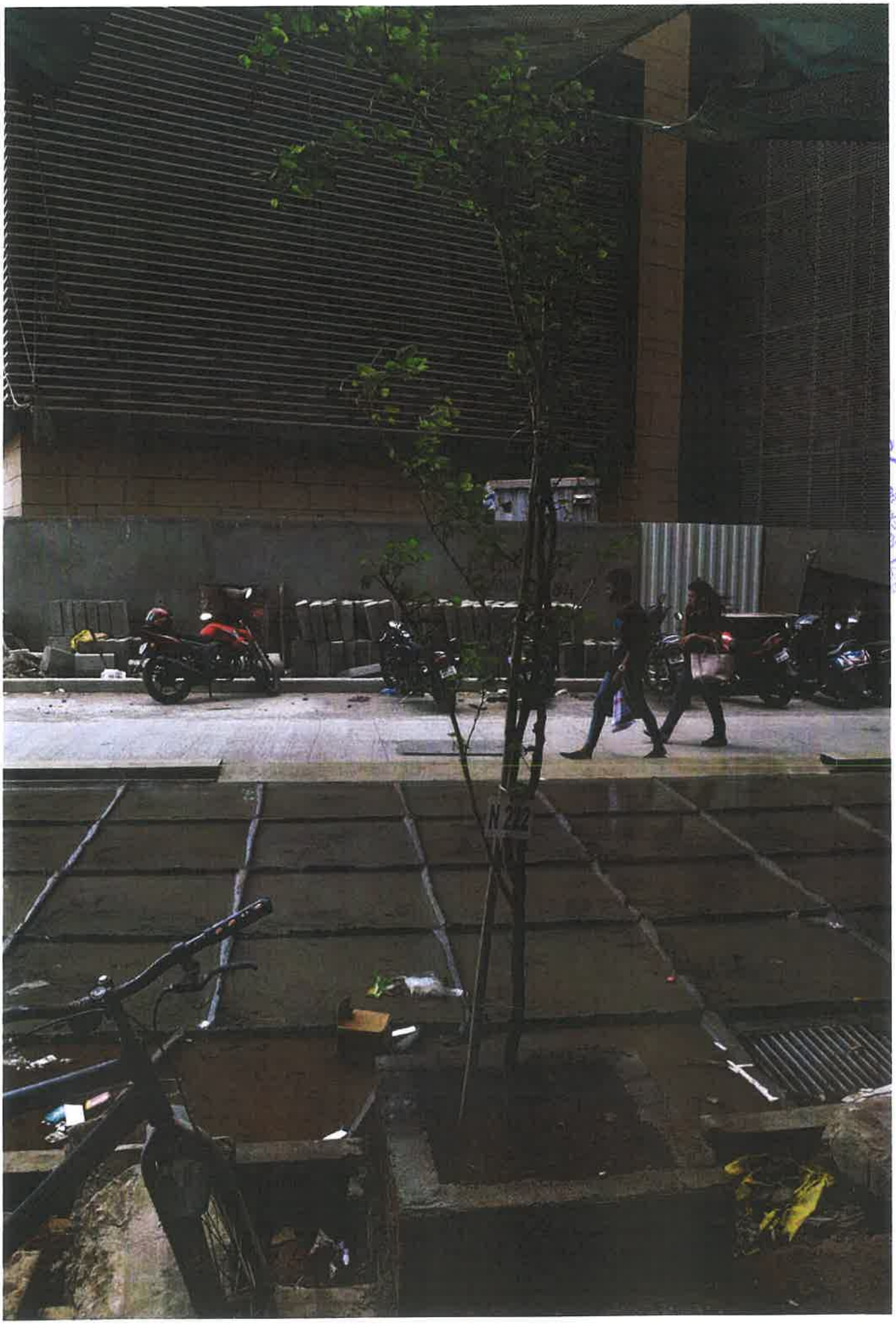

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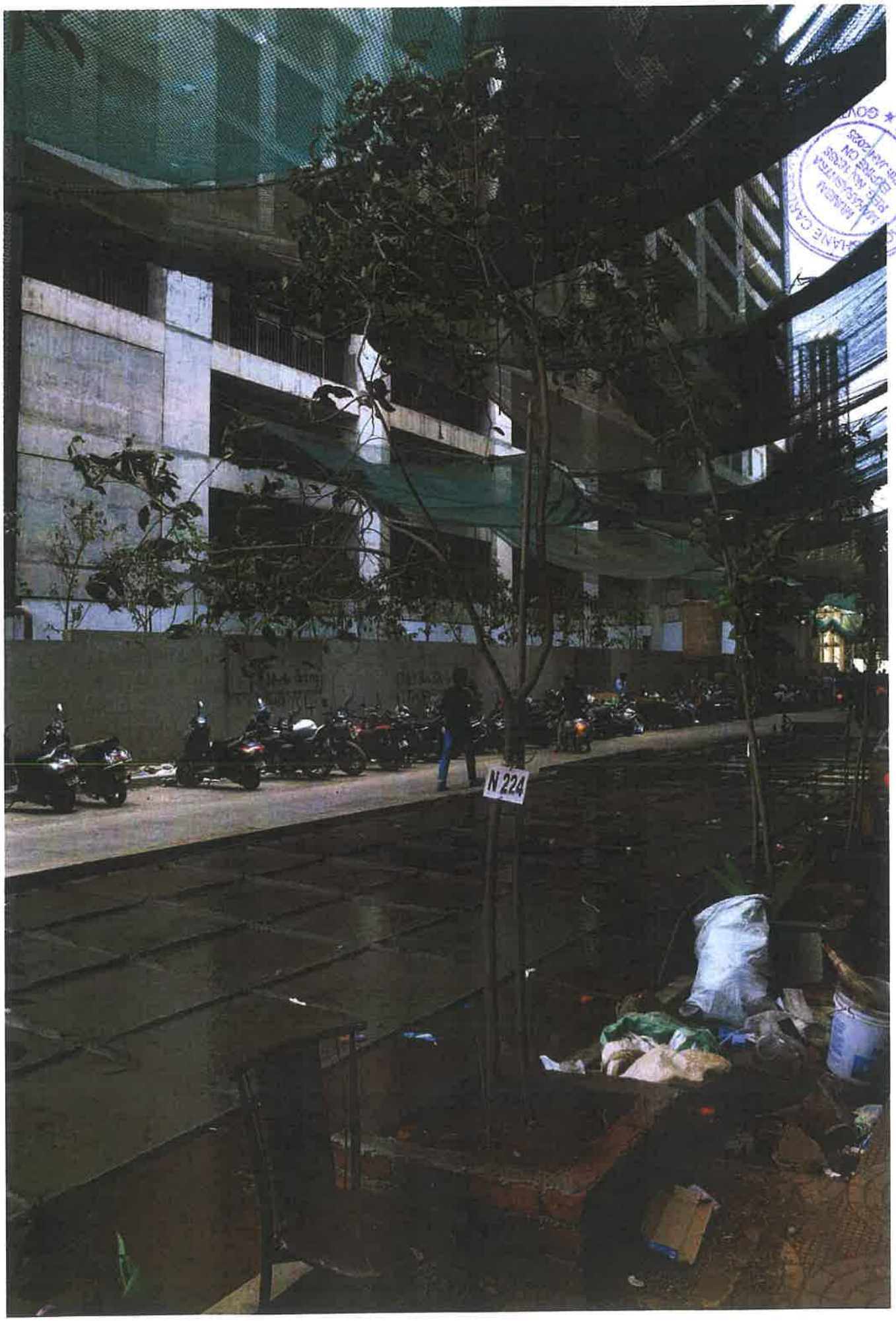

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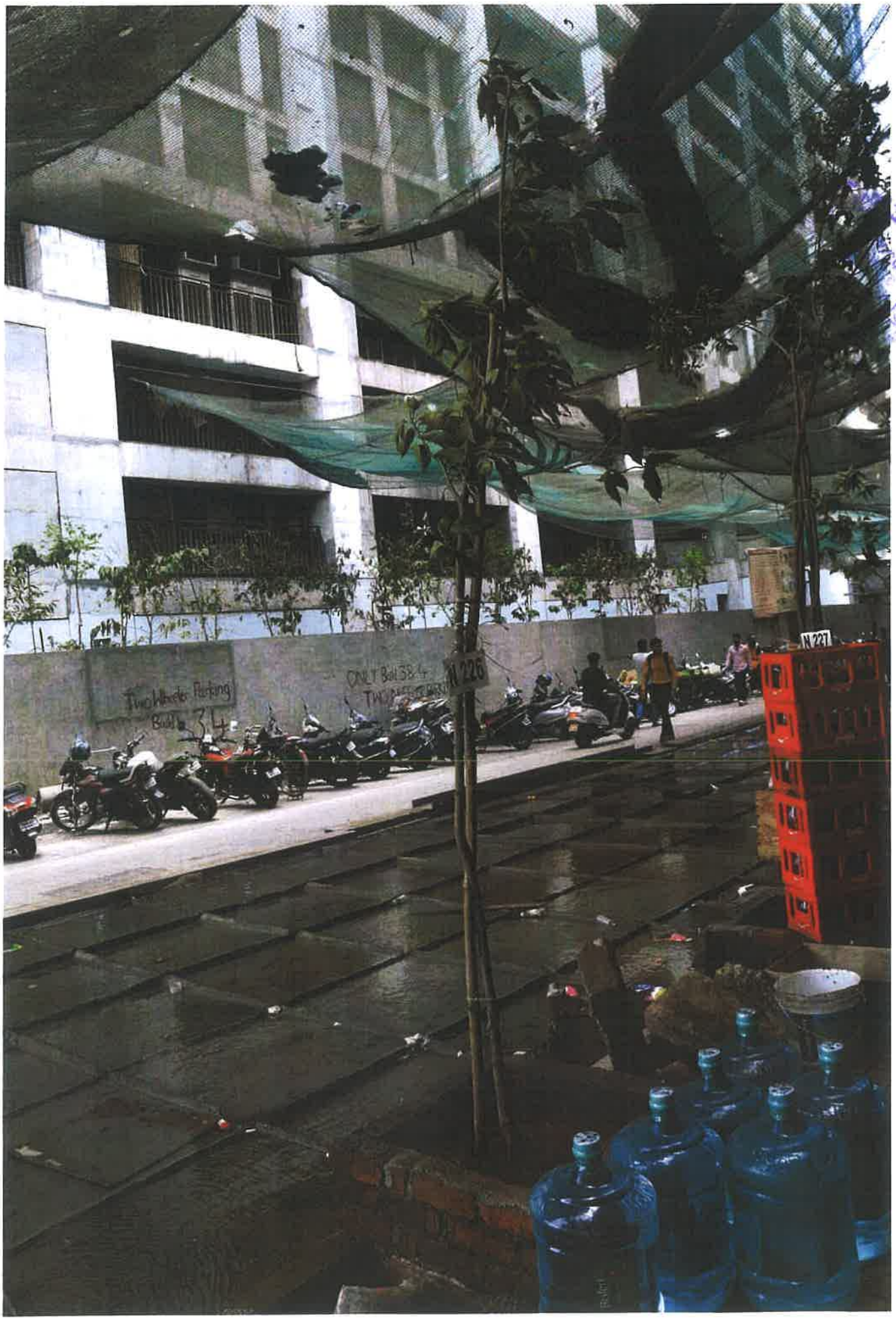

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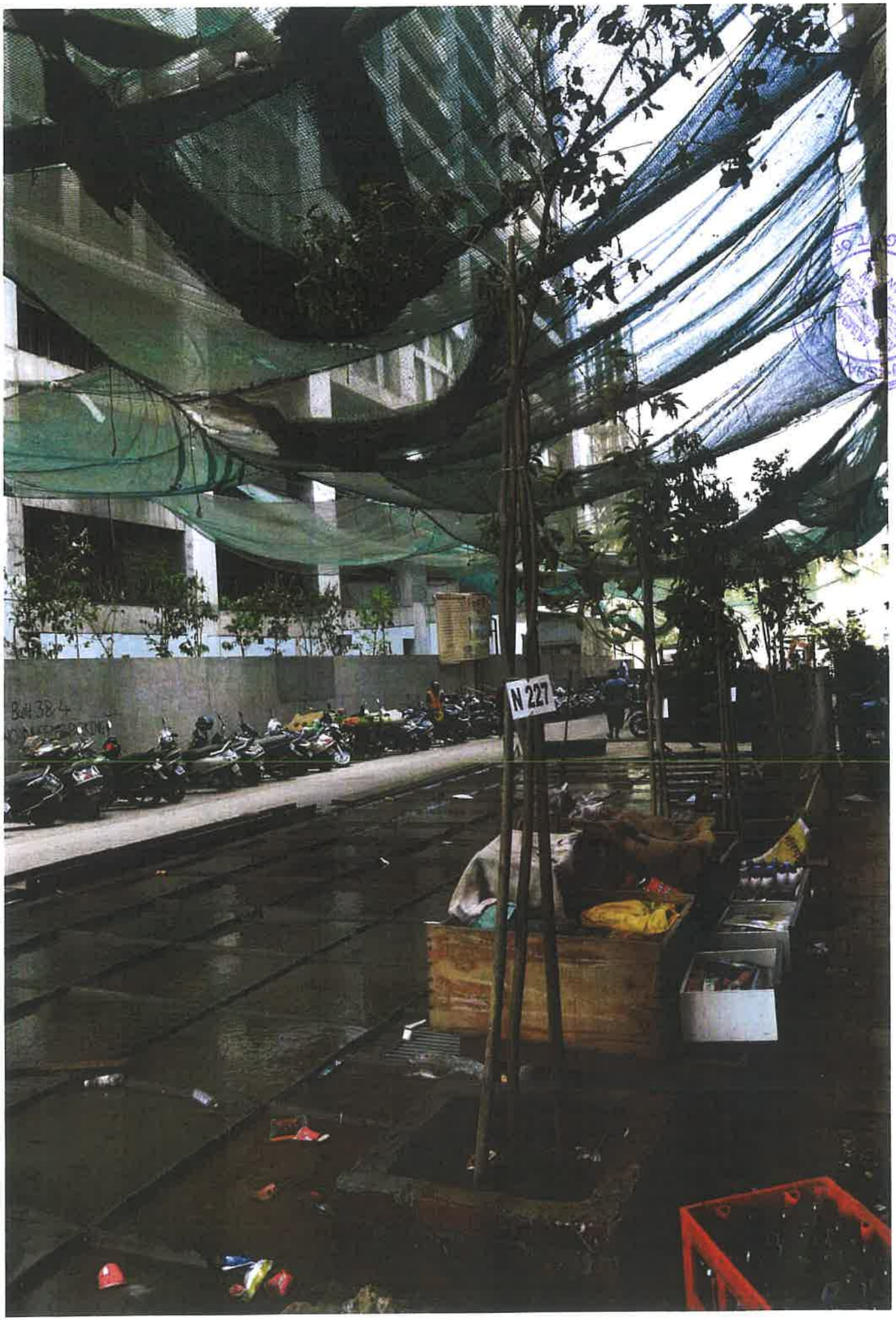

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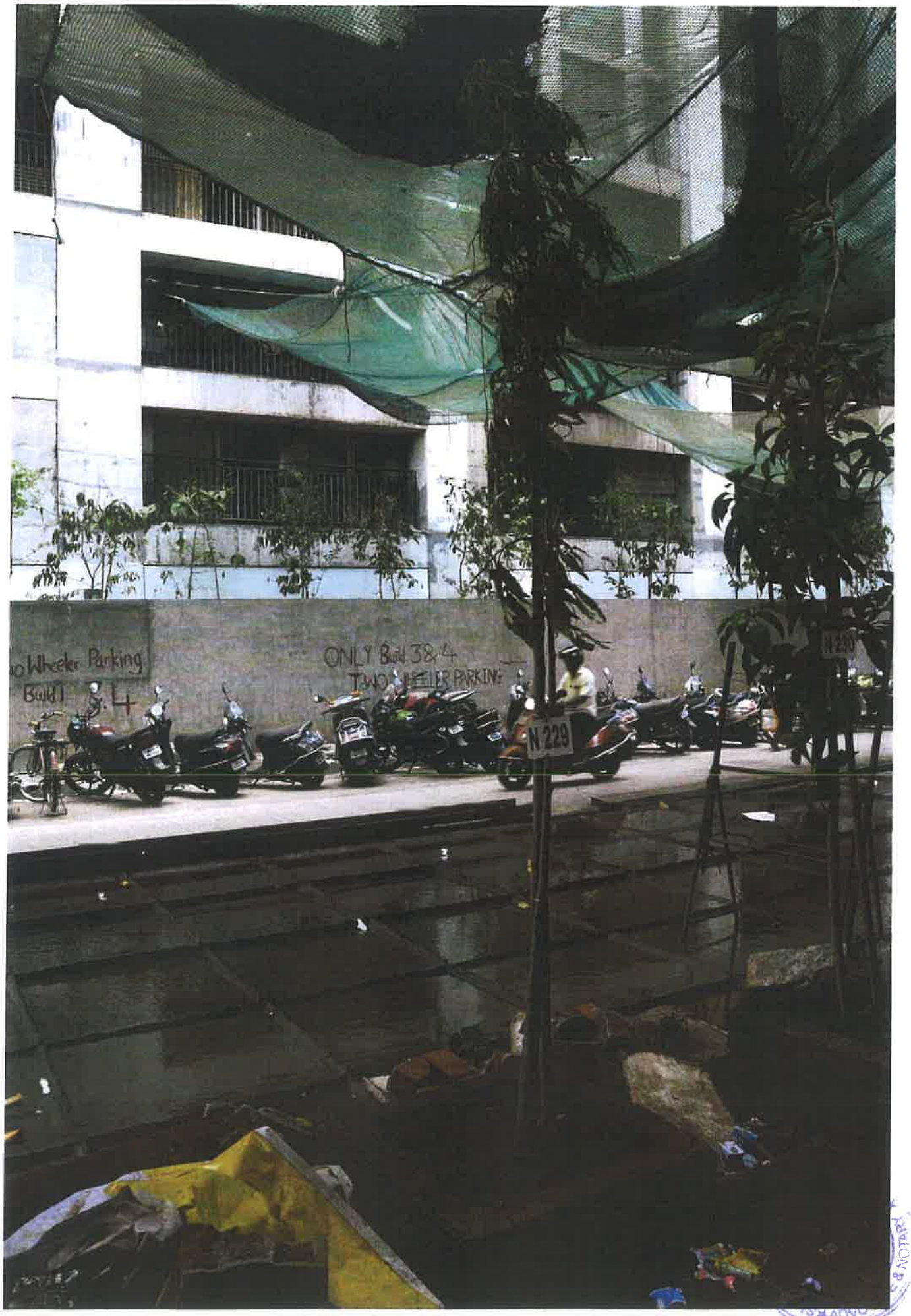

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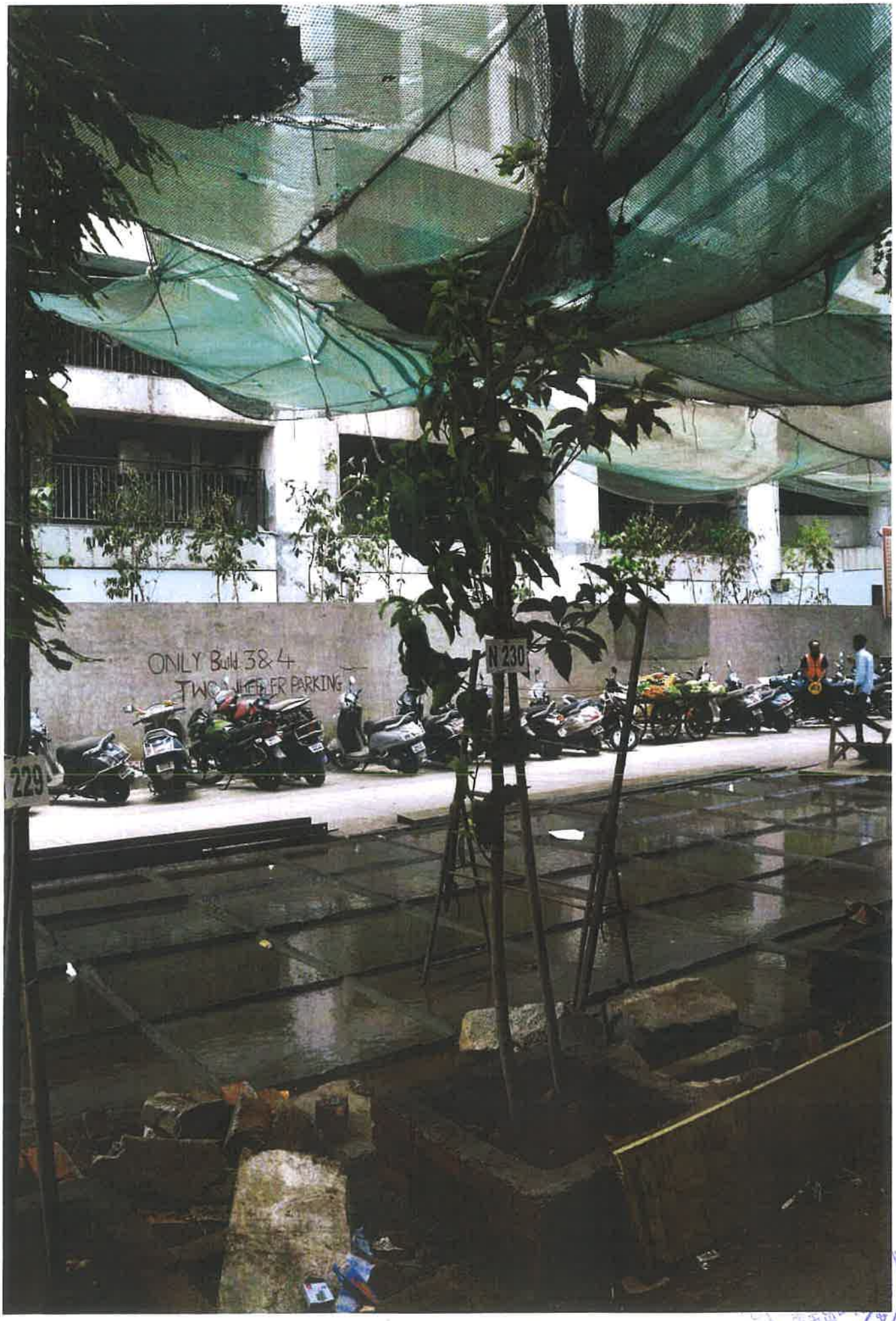

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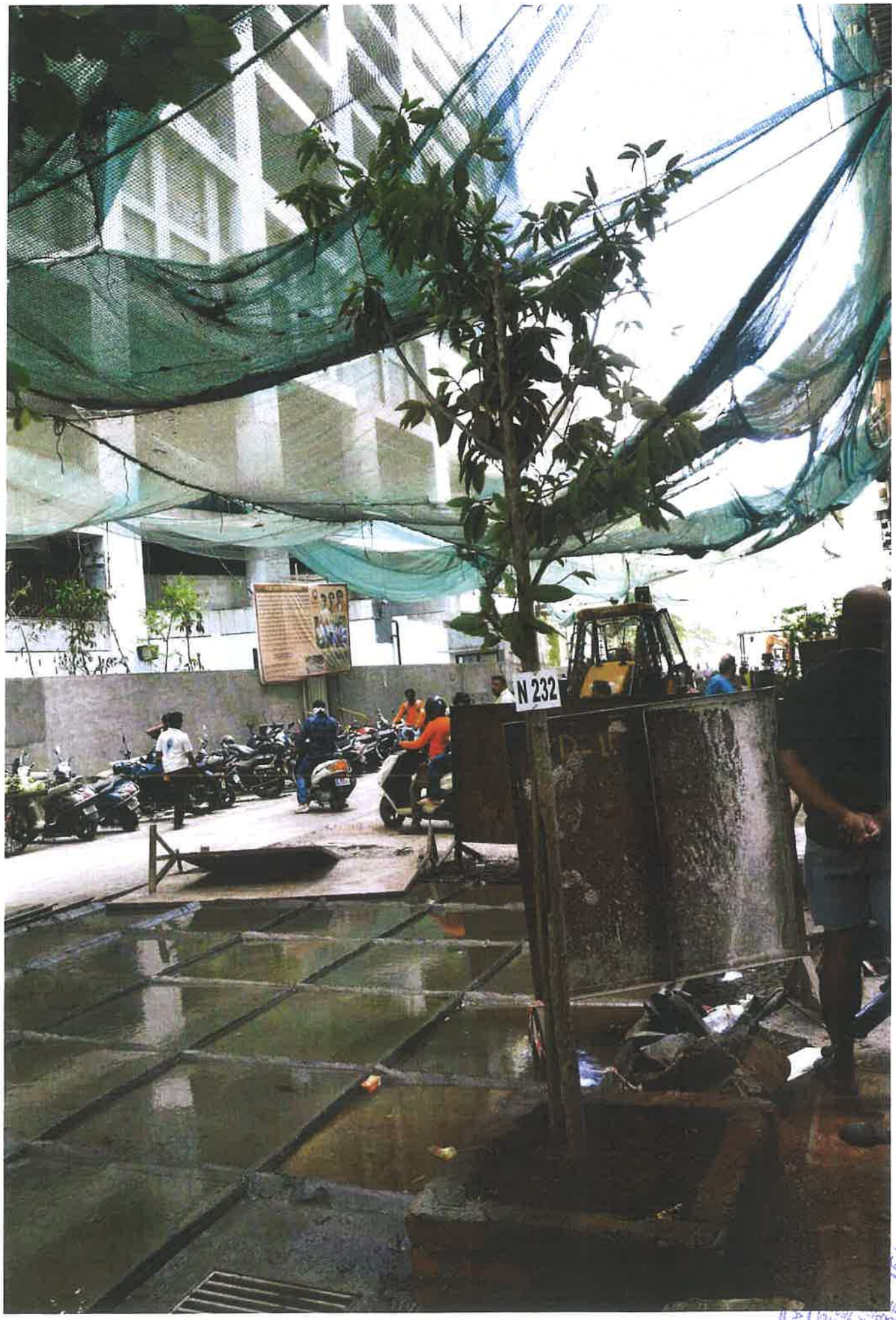

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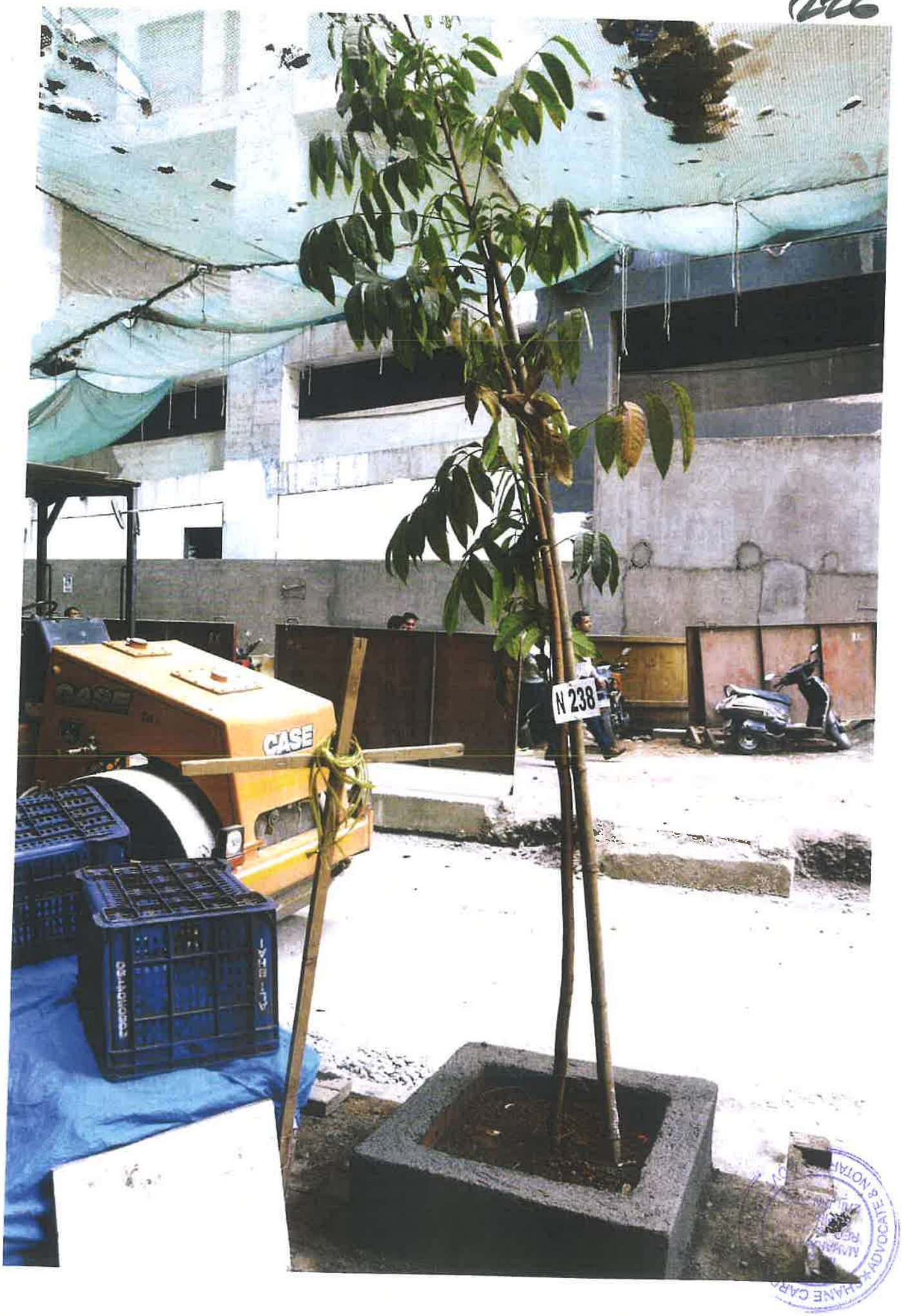

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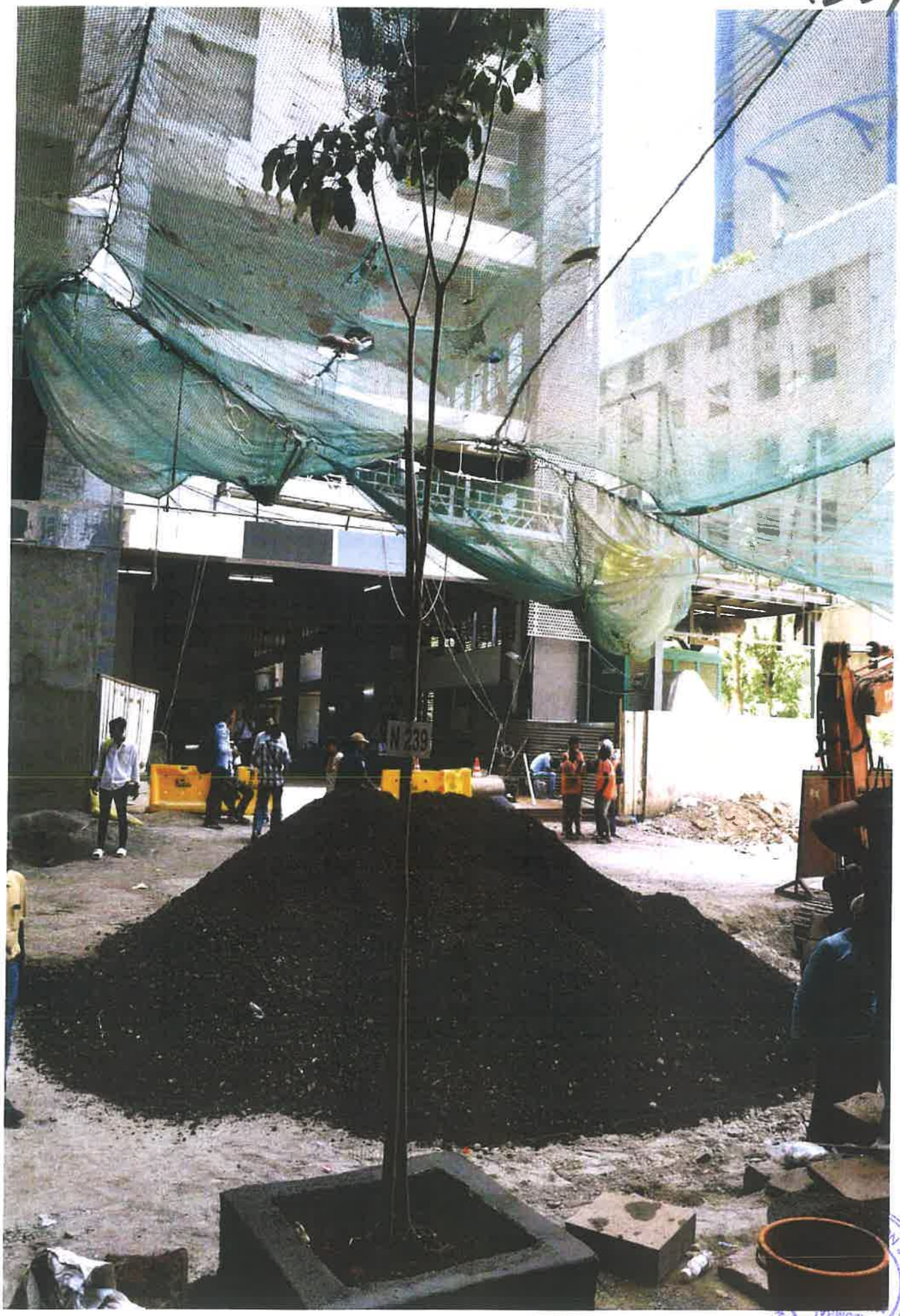

ADVOCATES & SOLICITORS
MUMBAI

TRUE COPY
228
Wadia Ghandy & Co.
Advocates, Solicitors &
N. M. Wadia Building
123, Mahatma Gandhi Road
Fort, Mumbai - 400 023.

N. M. Wadia Bldg.
123, Mahatma Gandhi R.
Fort, Mumbai - 400 023.
SHANE CARDOZ ADVOCATE
MUMBAI
MAHARASHTRA
REG. No. 10908
INDIA

BEFORE THE NATIONAL GREEN TRIBUNAL SITTING AT PUNE

MEMORANDUM OF APPLICATON

(Under Section 15 read with Section 18 of The National Green Tribunal Act, 2010)

APPLICATION NO. OA /34 OF 2023 /WZ

Sandeep Parkar & Another … Applicant

Versus

Member-Secretary, State Level Environment Impact & Others … Respondents

AFFIDAVIT IN REPLY

Dated the day of July, 2023

M/S. WADIA GHANDY & CO.
Advocates for the Respondent No. 5
N.M. Wadia Building
123, M.G. Road, Fort
Mumbai 400 001