

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

MEMORANDUM OF APPLICATION

REVIEW APPLICATION NO. 13 OF 2023

IN

ORIGINAL APPLICATION NOS. 74 & 75 OF 2022

(Disposed of on 11.10.2023)

IN THE MATTER OF:

City and Industrial Development Corporation of Maharashtra

.....Applicant

Versus

Maharashtra Coastal Zone Management Authority & Ors.

.....Respondents

INDEX

SR. NO.	PARTICULARS	PAGE NO.
1.	Affidavit in Reply on behalf of Respondent No. 4	226 - 232
2.	ANNEXURE R-1 - Copy of the order dated 15.09.2023	233 - 235
3.	ANNEXURE R-2 - Copy of the final cause list of 11.10.2023 that was uploaded on 10.10.2023	236 - 238
4.	ANNEXURE R-3 - Copy of the email dated 10.10.2023 (at 10:52 PM) sent by	239

	the Applicant-CIDCO to this Hon'ble Tribunal	
--	---	--



Advocate for Respondent No. 4

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

MEMORANDUM OF APPLICATION

REVIEW APPLICATION NO. 13 OF 2023

IN

ORIGINAL APPLICATION NOS. 74 & 75 OF 2022

(Disposed of on 11.10.2023)

IN THE MATTER OF:

City and Industrial Development Corporation of Maharashtra

.....Applicant

Versus

Maharashtra Coastal Zone Management Authority & Ors.

.....Respondents

AFFIDAVIT IN REPLY ON BEHALF OF RESPONDENT NO. 4

I, Anupam Verma, aged 48 years, Indian inhabitant, Authorised signatory of Respondent No. 4 & having the Respondent Society's address at 15/1101, Seawoods Estates, Sector 54, 56, 58, Nerul (West), Navi Mumbai - 400706 do hereby solemnly state that I am filing this short affidavit-in-reply as a response to the instant application filed by CIDCO.

1. At the outset, I say that a perusal of the Review Application clearly states that the Applicant-CIDCO seeks review on the following grounds:

- (i) That this Hon'ble Tribunal did not consider the documents brought on record *vide* affidavit dated 10.10.2023 before pronouncing the judgment on 11.10.2023;



- (ii) That this Hon'ble Tribunal ought not have passed the order restraining Sale, Lease and Transfer
2. I say that I shall now deal with both the aforesaid grounds in the below mentioned paragraphs.

I. This Hon'ble Tribunal did not consider the documents brought on record by CIDCO *vide* affidavit dated 10.10.2023 before pronouncing the judgment on 11.10.2023

3. I say that the Applicant has specifically contended in Paras 5, 6, 16 & 17 of the Review Application that this Hon'ble Tribunal has committed an error apparent in law by not considering the documents that were filed *vide* affidavit dated 10.10.2023. I say that this contention deserves to be dismissed for the reason that it is a settled position in law that no additional evidence by way of an application, let alone an independent affidavit, can be filed by any party after conclusion of the hearing of the parties and thereby no additional evidence can be filed from the stage of reserving for judgment upto the pronouncement of judgment.
4. I say that this Hon'ble Tribunal had reserved the original proceedings (OA No. 74 of 2022) for judgment on 15.09.2023 after which this Hon'ble Tribunal issued/uploaded the final cause list of 11.10.2023 on the evening of 10.10.2023, which specifically stated that the OA is listed for '*pronouncement of judgment*' on 11.10.2023. Annexed and marked hereto as ANNEXURE R-1 is a copy of the order dated 15.09.2023 and as ANNEXURE R-2 is a copy of the final cause list of 11.10.2023.



5. I say that the night (at 10:52 PM on 10.10.23) before the OA was listed for pronouncement of judgment, the Applicant – CIDCO had attempted to file an affidavit dated 10.10.2023 by way of an email, through its advocate Mr. Shivshankar Swaminathan, addressed to this Hon'ble Tribunal (at ngt-pune@gov.in) while marking the same to the advocate of the Answering Respondent. Annexed and marked hereto as **ANNEXURE R-3** is a copy of the email dated 10.10.2023 (at 10:52 PM) sent by the Applicant-CIDCO to this Hon'ble Tribunal. On 11.10.2023, when the OA was called out for pronouncement, an oral attempt was also made by the Applicant-CIDCO herein to bring the affidavit dated 10.10.2023 on record to which this Hon'ble Tribunal outrightly rejected the same after which the said affidavit was not allowed to be brought on record as the arguments were already heard in the matter and the OA was closed for judgment on 15.09.2023.
6. I say that it is a settled position in law that there is no stage that exists between the reservation of judgment and pronouncement of judgment and therefore, no application for additional evidence, let alone an independent affidavit, can be moved or filed after the arguments were heard/completed and after the OA was closed for judgment. By virtue of this Hon'ble Tribunal having rejected the affidavit dated 10.10.2023 and having refused to bring the same on record, the Applicant-CIDCO cannot rely upon the said affidavit dated 10.10.2023 in its review application because not only has the said affidavit been rejected by this Hon'ble Tribunal in the original proceedings but even if it is assumed that this Hon'ble Tribunal did not expressly reject it, the prevailing position of law makes it abundantly clear that no such affidavit/application can be filed as there is no stage left between the closure of the case for judgment and the pronouncement of the



judgment itself and hence, this affidavit dated 10.10.2023 cannot be read in the review proceedings. Since the clock was not allowed to be set back earlier in the original proceedings, it cannot be done in a review either.

7. Notwithstanding the above, I further say that the Applicant-CIDCO has wrongly presumed that the affidavit dated 10.10.2023 was brought on record on the night of 10.10.2023 (*at 10:52 PM*) and was adduced in evidence, which is wholly incorrect factually and legally. Therefore, neither the pleadings stated in the said affidavit nor the documents annexed therein can be relied upon in the present review proceedings.

II. This Hon'ble Tribunal ought not have passed the order restraining Sale, Lease and Transfer

8. I say that as regards this ground, the Applicant seeks to re-agitate and re-address the following issues which have already been dealt with by this Hon'ble Tribunal between Paras 18 to 32 of the Review Petition and a table demonstrating its reference in the judgment with corresponding paragraphs is stated hereinbelow:

Sr. No.	Arguments in Review Petition (RP)	Reference in the judgment dated 11.10.2023
1.	Granting a relief of restraining disposal of lands is outside the scope of NGT Act, 2010 (Para 18, RP)	Para 9
2.	Affidavit dated 14.11.2022 annexes CZMP 1991 approved in 1996, CZMP 2011 & CZMP 2019	Para 12



	and that CZMP 2019 superseded 2011 has not been taken cognizance of. (Para 19, 29, RP)	
3.	Whether the subject road is in existence or not? (Paras 20 - 23, 26-27, 30-32, RP)	Paras 7, 11, 19, 20, 23 (i), 23 (iii), 24 – 27, 30
4.	That the plot is not a 'No Development Zone'. (Paras 24, 25, RP)	Paras 3, 7, 14, 16, 20, 29
5.	The suggestion of retaining Plot 2A as a social facility is unwarranted. (Para 28, RP)	Paras 16, 29-30

9. I say that the above clearly demonstrates that between Paras 18 to 32 of the Review Application, the Applicant-CIDCO is attempting to re-agitate the same issues and is repeating the same overruled arguments which have already been dealt with by this Hon'ble Tribunal in respective portions of the judgment as stated in the table above and therefore, in no manner can it be stated that there is an error apparent on the face of the record. I say that the Applicant is attempting to have this Hon'ble Tribunal to re-hear the entire proceedings in a review, which cannot be allowed as a review cannot be an appeal in disguise. I say that the aforesaid grounds do not qualify as errors which are self-evident and since they have to undergo a process of detection and examination to establish it, such alleged grounds do not fulfil the test for entertaining a review under Order 47 Rule 1 of CPC, 1908. Further, the mere possibility of two views on the same subject is also not a ground for review as attempted by the Applicant-CIDCO.

10. I say that the entire review petition seeks that this Hon'ble Tribunal re-appreciate the entire evidence and reach a different conclusion, which even if possible, is not open for this Hon'ble Tribunal for the reason, as



held by the Apex Court, that the appreciation of evidence on record is fully within the domain of the appellate court and to permit the review applicant to argue on a question of appreciation of evidence would amount to converting a review petition into an appeal in disguise.

REPLY TO IA NO. 73 OF 2024 IN THE PRESENT APPLICATION

11. I say that the Applicant-CIDCO has filed an IA seeking to bring on record the following five (5) documents in the review application:

- (i) Report from NCSCM of March, 2024
- (ii) CRZ Map prepared by NCSCM of March, 2024
- (iii) Map prepared by NCSCM based on field visit of January, 2024
- (iv) Order dated 06.12.2023
- (v) New photographs and satellite imageries of roads

12. I say that a mere perusal of the documents at 11(i), (ii), (iii) and (v) above clearly show that the said documents are prepared subsequent to the passing of the original judgment and therefore, it cannot be said that these documents existed at the time of passing of the judgment and were not in possession of the Applicant in spite of exercising due diligence. I say that a discovery of new document which was in existence at the time of passing of the judgment but could not be produced by the Applicant after undertaking due diligence before the passing of the judgment is the parameter/basis on which a new document can be relied on while seeking a review. That a review application does not allow a party to rely on an entirely new document which has been prepared subsequent to the judgment dated 11.10.2023. Therefore, the aforesaid four (4) documents are irrelevant for the purposes of the present review



application and cannot be relied upon, as per the test laid down under Order 47, Rule 1 r/w the binding precedents of the Apex Court.

13. I say that the document at 11(iv) is an order dated 06.12.2023 which already forms a part of the record of this Hon'ble Tribunal and therefore, this Hon'ble Tribunal need not be burdened with repetitive documents and hence, be rejected. Therefore, IA No. 73 of 2024 deserves to be dismissed as no material documents which are relevant for the purpose of a review application have been annexed to the IA.

14. In light of what is stated hereinabove, I say that the review petition deserves to be dismissed with costs as the test to allow a review petition as laid down under Order XLVII of CPC, 1908 r/w the binding precedents of the Apex Court has not been fulfilled.

Solemnly affirmed at Navi Mumbai)

Dated this 10th Day of April, 2024)
13 APR 2024

Identified by Me

Zaman Ali,

Advocate for Respondent No. 4

Respondent No. 4
BEFORE ME

U/Aachar / PAN / DL. 238940289186

Seen Orq / POA / Board Resol



Adv. S. N. Dhanage
Notary Govt Of India
Regd. No. 15376 MUMBAI (MS)
404-405, 4th Floor, Devnar House,
197/199, Near Central Camera Bldg,
D.N. Road, E-1, 40001

Dhanage

NOTED & REGISTERED

sr. No. 956 Page No. 41

Dated 13 APR 2024

ANNEXURE R-1

Item Nos.6 & 7

(Pune Bench)

**BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE**

THROUGH PHYSICAL HEARING (WITH HYBRID OPTION)

Original Application No.74/2022(WZ)

Navi Mumbai Environment Preservation Society

.....Applicant

*Versus*City and Industrial Development Corporation of
Maharashtra & Ors.

....Respondent(s)

WITH**Original Application No.75/2022(WZ)**

Rekha Sankhala & Ors.

.....Applicant(s)

*Versus*City and Industrial Development Corporation of
Maharashtra & Ors.

....Respondent(s)

Date of hearing: 15.09.2023

**CORAM: HON'BLE MR. JUSTICE DINESH KUMAR SINGH, JUDICIAL MEMBER
HON'BLE DR. VIJAY KULKARNI, EXPERT MEMBER****In O.A.74/2022(WZ)**

Applicant : Mr. Zaman Ali, Advocate

Respondent(s) : Ms. Ayushi Anandpara, Advocate along-with
Mr. Shivshankar Swaminathan, Advocate and
Dr. Priya K., Senior Planner, CIDCO for R-1/CIDCO
Mr. Aniruddha Kulkarni, Advocate for R-2/MCZMA &
R-3/State Env't. Deptt.
Mr. D.M. Gupte, Advocate for R-4/MoEF&CC**In O.A.75/2022(WZ)**Applicant : Mr. Akash Rebello, Advocate along-with
Ms. Meenaz Kakalia, AdvocateRespondent(s) : Ms. Ayushi Anandpara, Advocate along-with
Mr. Shivshankar Swaminathan, Advocate and
Dr. Priya K., Senior Planner, CIDCO for R-1/CIDCO
Mr. D.M. Gupte, Advocate for R-2/MoEF&CC
Mr. Aniruddha Kulkarni, Advocate for R-3/State Env't.
Deptt. & R-4/MCZMA

ORDER

1. Since prayers made in both the applications are related to the same plot, only applicants are different, we deem it appropriate to decide these two original applications together.

Original Application No.74/2022(WZ)

2. From the side of the applicant, learned Counsel Mr. Zaman Ali has appeared.

3. From the side of respondent No.1/CIDCO, learned Counsel Ms. Ayushi Anandpara along-with learned Counsel Mr. Shivshankar Swaminathan and Dr. Priya K., Senior Planner, CIDCO have appeared; from the side of respondent No.2/Maharashtra Coastal Zone Management Authority (MCZMA) and for respondent No.3/State Environment Department, learned Counsel Mr. Aniruddha Kulkarni has appeared; and from the side of respondent No.4/MoEF&CC, learned Counsel Mr. D.M. Gupte has appeared.

Original Application No.75/2022(WZ)

4. From the side of the applicants, learned Counsel Mr. Akash Rebello along-with learned Counsel Ms. Meenaz Kakalia have appeared.

5. From the side of respondent No.1/CIDCO, learned Counsel Ms. Ayushi Anandpara along-with learned Counsel Mr. Shivshankar Swaminathan and Dr. Priya K., Senior Planner, CIDCO have appeared; from the side of respondent No.2/MoEF&CC, learned Counsel Mr. D.M. Gupte has appeared; and from the side of respondent No.3/State Environment Department and for respondent No.4/Maharashtra Coastal Zone Management Authority (MCZMA), learned Counsel Mr. Aniruddha Kulkarni has appeared.

6. Arguments concluded in both the matters. Reserved for Judgment.

Dinesh Kumar Singh, JM

Dr. Vijay Kulkarni, EM

September 15, 2023
Original Application No.74/2022(WZ)
WITH
Original Application No.75/2022(WZ)
P.Kr

True Copy
JMS

236
NATIONAL GREEN TRIBUNAL
(WESTERN ZONE BENCH)
NEW ADMINISTRATIVE BUILDING, 1ST FLOOR, B WING, CAMP, PUNE
PUNE

ANNEXURE R-2 **320**

CAUSE LIST OF PUNE ZONAL BENCH

Date: 11th October, 2023
Time: 10:30 A.M

HON'BLE MR. JUSTICE DINESH KUMAR SINGH
JUDICIAL MEMBER

HON'BLE DR. VIJAY KULKARNI
EXPERT MEMBER

THROUGH PHYSICAL HEARING (WITH HYBRID OPTION)

S.NO.	CASE NO.	PARTIES	COUNSEL FOR PARTIES
FOR PRONOUNCEMENT OF ORDER/ JUDGEMENT			
1.	Original Application No. 74/2022 (WZ) WITH	Navi Mumbai Environment Preservation Society V/s City and Industrial Development Corporation of Maharashtra & Ors.	Mr. Zaman Ali, Adv for Applicant Mr. Subodh Kantak a/w Abhijit Gosavi, Mr. Samit shukla, DSK Legal & Mr. Shivshankar Swaminathan, Ms. Saloni Shah & Dr. Priya K. Senior CIDCO, Planner, Advs. for R-1 Mr. Aniruddha Kulkarni, For R-2 & 3 Mr. D M Gupte For R-4
2.	Original Application No. 75/2022 (WZ)	Rekha Sankhala & Ors. V/s City and Industrial Development Corporation of Maharashtra & Ors	Ms. Meenaz Kakalia, Adv for Applicant Mr. Subodh Kantak, Samit Shukla & DSK Legal & Mr. Shivshankar Swaminathan, Dr. Priya K. Senior CIDCO, Planner Adv. for R-1 Mr. Aniruddha Kulkarni, Adv. For R-4 Mr. D M Gupte, Adv. For R-2, MoEF & CC Mr. Aniruddha Kulkarni, Adv. for R-3
FOR ADMISSION			
3.	Execution Application No. 21/2023(WZ) In Original Application No. 75/2021(WZ)	The Cliff Garden Co-op. HSG. Society Ltd. V/s Gram Panchayat, Maan & Ors.	Mr. Saurabh Kulkarni, Adv. for Applicant
AFTER NOTICE			
4.	Original Application No. 104/2023(WZ)	Charan Bhatt V/s Environment & Climate Change Dept. & Ors.	Applicant-in-person Remarks: Service affidavit filed by Applicant. Affidavit w.rt. correction in name of R-8 filed by applicant .
FOR FURTHER CONSIDERATION			
5.	Original Application No. 43/2023(WZ) I. A. No. 180/2023(WZ)	Sagar Kantilal Devre V/s State Of Maharashtra & Ors	Mr. Sangram Gidh & Kaustubh Gidh & Kartik Bahadur, Adv. for Applicant.

			<p>Mr. Aniruddha Kulkarni, Adv. for R-1 Mr. Prakash Shejal, Mr. Sameer Khale & Mr. Rahul Garg, Adv. for R-2 Ms. Manasi Joshi, Adv. for R-4 Mr. Girish Utangale, Adv. for R-3 Mr. Jaywant Patil, Mr. Shailesh Kantharia & Mr. Raheshkumar Patel, Advs. for R-8</p> <p>Remarks: I. A. No. 180/2023(WZ) For Impleadment Reply affidavit filed by R-12 to 21 Reply affidavit not filed by R-2.</p>
6.	<p>Original Application No. 65/2023(WZ) Earlier Original Application No. 276/2022(PB) L.P.</p>	<p>Rakesh Patel V/s State Of Gujarat</p>	<p>Mr. Ninad Laud, Mr. Ivo D'Costa & Rashika Narain, S Swaminathan Mr. Mitul shelat, Adv. for R-4 (Bodal chems.)</p> <p>Ms. Manavi Damle, Adv. for R-1 Mr. Maulik Nanavati Av for GPCB Mr. Ashutosh Kumar, Fantreshwar Jha, & Navin Kumar, Adv. for Mayur Dye chem/R-2. Mr. Surabh Kulkarni & Mr. Prashant Bhat, Adv. for R-5 & 6</p> <p>Remarks: Notice sent to R-5 & 6 Report filed by GPCB</p>
7.	<p>Org. Application No. 91/2023(WZ) (Earlier Dy. No. 2704105002152023)</p>	<p>Aditya Singh Chauhan V/s GPCB & Ors.</p>	<p>Mr. Ajit Kumar Singh, Ms. Laxmi Singh, M/s A.K. Singh & Associates Advs. for Applicant</p> <p>Mr. Jash Thakkar, Adv. for R-1 Mr. Rahul Garg & Raghvendra Kulkarni, Adv. for R-8 Mr. Ashish H Shah Adv for R 9 to 22, 24 to 26,28, 29,30,34, 35,36 to 40, 42 to 48, 49,51, to 63</p> <p>Remarks: Objection filed by Applicant (through mail). Reply affidavit filed by R-1 & 62 along with PIL copy Reply affidavit not filed by R-8</p>
CASE AT SR. NO. 08 WILL BE TAKEN- UP FOR HEARING ON 26-02-2024			
FOR FINAL HEARING/ARGUMENT			
8.	<p>Appeal no. 20/2022(WZ) I.A. No.63/2022(WZ) I.A. No. 64/2022(WZ)</p>	<p>Paul Lobo & Ors. V/s Goa Coastal Zone Management Authority & Ors.</p>	<p>Ms. Ronita Bhattachaya, Adv. for Appellant Mr. Abhay Anturkar, Mr. Dhruv Tank & Ms. Bhavya Pande, Adv. for R-1 Mr. Somnath Kapre, Mr. Abhishek Sawant, Adv for R-2 Ms. Shirin Khajuria, Adv. for R-3 Mr. D.M Gupte ,Adv. for R-4</p> <p>Remarks: CZMP not filed by R-4</p>

<https://ngt-pune.webex.com/ngt-pune/j.php?MTID=mc876ea275054e8fdebcb017329cc005>

For detailed Standard Operating Protocol for Virtual Video Conferencing in NGT please visit our link: https://greentribunal.gov.in/sites/default/files/all_documents/SOPngt.pdf

The lawyers/litigants desirous of participating personally in VC hearings are required to send request at ngt-pune@gov.in in advance, giving their names, case title, case number, date of hearing, email IDs, mobile numbers, etc.

INSTRUCTIONS FOR SMOOTH VC HEARINGS

While joining, the VC room, enter details only in the following format :

Item No. (XX) – (NAME) – (PARTY)

e.g.

Item 2 – Name – Petitioner

Item 4 –Name– Adv. for Resp. 2 & 4

Item 7 –Name– Adv for SPCB

Item 1 –Name – DM for State of xyz

After joining, ensure that –

VIDEO is always on OFF mode AND MIC is always on MUTE mode

Video should be switched ON only by the parties to a case, when the concerned Item No. is called for hearing.

Mic should be UNMUTED only by the party speaking.

Switching On the Video or UNMUTING the Mic otherwise will disturb the hearing of ongoing matters.

Note 1

A prayer for adjournment will be considered as per [Office Order No. NGT/PB/RG/2018/134 dated 20.02.2020](#).

Note 2

As indicated in the [Office Order No. NGT/PB/RG/2018/135 dated 20.02.2020](#), reports received in the matters are uploaded on the Website of NGT for access by all concerned. Non-availability of such report with party shall not be accepted as denial of opportunity or a ground for adjournment.

Note 3

As indicated in the notice no. NGT/WZB/Pune/288/2022 dated 21.05.2022, Parties and Advocates are hereby informed that in case they want their matter/s to be heard urgently they may make mention it before the Hon'ble Bench between 10:30 – 10:35 A.M.

[Notice dated 21.05.2022 regarding listing of the matters for urgent hearing](#)

True Copy
Ludhiana

ANNEXURE R-3

Zaman Ali <zamanali1602@gmail.com>

Additional Affidavit on behalf of Respondent No 1 in OA 75/2023

2 messages

Shivshankar Swaminathan <shivshankar.swaminathan@yutilaw.com> Tue, Oct 10, 2023 at 10:52 PM
To: National Green Tribunal Pune <ngt-pune@gov.in>, Zaman Ali <zamanali1602@gmail.com>, meenazkakalia@gmail.com, Deepak Gupte <advgupte@gmail.com>, Aniruddha Kulkarni <aniruddha1488@gmail.com>
Cc: saloni.shah@dsklegal.com

Sir,

Please find attached Additional Affidavit on behalf of Respondent No 1 CIDCO in the captioned OA.

Regards,

Shivshankar Swaminathan | Associate

15 & 22, P.J. Chambers | Off Mumbai Pune Road | Pimpri, Pune 411018 India
Tel: +91 20 2742 2068 Mob: +917875874915, 99531 19883
shivshankar.swaminathan@yutilaw.com | www.yutilaw.com

Delhi Office

A-84, First Floor | Defence Colony | New Delhi 110024 India
Tel: +91 11 4504 9130

This communication is intended solely for the addressee. The message including attachments contained herein is confidential and is likely to be privileged communication. If you are not the intended recipient, you are requested to notify Yuti Law Partners by replying to the sender and thereafter delete this email. In such an event, any disclosure, distribution, copying, publication may be unlawful and you are advised to not act on the contents. Neither Yuti Law Partners nor any of its principals, members, employees etc shall be liable for any improper transmission of this communication nor any damage caused or may have been caused as a result of the same.

CIDCO Additional Affidavit 10.10.2023.pdf
4846K

Zaman Ali <zamanali1602@gmail.com>
To: NMEPS <archana.nmeps@gmail.com>

Tue, Oct 10, 2023 at 11:07 PM

[Quoted text hidden]

CIDCO Additional Affidavit 10.10.2023.pdf
4846K

The Copy

BEFORE THE NATIONAL GREEN
TRIBUNAL, WESTERN BENCH
SITTING AT PUNE
REVIEW APPLICATION NO. 13 OF
2022
IN
ORIGINAL APPLICATION
NO. 74 OF 2022

BETWEEN:

CIDCO ...APPLICANTS

Versus

Maharashtra Coastal Zone Management

Authority & Ors. ...RESPONDENTS

**AFFDAVIT IN REPLY ON BEHALF OF
RESPONDENT NO. 4**

Dated this 10th day of April, 2024

ZAMAN ALI

Advocate for Respondent No. 4

17, 1st Floor, Rohit Chambers, Janmabhoomi

Marg, Fort, Mumbai – 400 001

+91-9167628833

zamanali1602@gmail.com