

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN
ZONAL BENCH AT CHENNAI**

APPEAL NO. 35 of 2025

IN THE MATTER OF

1. G. MOHANA PRIYA,
D/o. Gopinath,
Aged about 29 years,
N-4, Bajanai Koil Street,
Gurupatham Nagar,
Varadharajapuram,
Kancheepuram, Tamil Nadu- 600044
2. A.R. RATHNAKUMAR
S/o. Rathnasabapathy
Aged about 66 years,
N-9, Moogambigai Nagar,
Varadharajapuram,
Kancheepuram, Tamil Nadu- 600044
3. RAYYAPAN VEERARAGHAVAN
S/o. Veeraraghavan,
N-3/30, Christhu Raja Kovil Street,
Erumaiyur, Tirumudivakkam,
Sriperumbudur, Kancheepuram,
Tamil Nadu – 600044
4. JOSE PUNNOOSE
S/o. M.C. Punnoose,
N-82, Navodaya, Varadharajapuram,
Kancheepuram, Tamil Nadu – 600044.

...Appellants

-Vs-

1. TAMIL NADU STATE ENVIRONMENT IMPACT ASSESSMENT
AUTHORITY (SEIAA),
Through the Chairman
Ground Floor, Panagal Maligai, No.1 Jeenis Road,
Saidapet,
Chennai-600015
Tamil Nadu
2. Union of India

Through the Secretary,
Ministry of Environment, Forest and Climate Change,
Indira Paryavaran Bhavan, Ali Ganj,
Jorbagh Road, New Delhi – 110003.

3. Alliance Infrastructure Projects Pvt Ltd
Through the Managing Director,
Plot No. 'A, No. 36/1, Gandhi Mandapam Rd,
Chitra Nagar, Kotturpuram,
Chennai- 600085
4. Urban Rise (OPIUS 96)
Through the Managing Partner,
Plot No. A, No. 36/1, Gandhi Mandapam Rd,
Kotturpuram, Chennai – 600085
5. Kishkinta Land Developers Pvt Ltd
Through the Director,
Manek Mahal,
6th Floor, 90 Veer Nariman Road,
5 Mumbai, Maharashtra- 400020.

...RESPONDENTS

ADOPTION MEMO FILED ON BEHALF OF RESPONDENT NO. 4

1. It is respectfully submitted that the instant appeal has been filed under section 16(h) of the National Green Tribunal Act 2010 against the grant of Environmental Clearance bearing EC Identification No. EC24B3812TN5371181N, in Proposal Number: SIA/TN/INFRA/515722/2024, File No. 11714 dated 02.04.2025 accorded by the State Environment Impact Assessment Authority (SEIAA), Tamil Nadu to Respondent 3 under Category B1 of Item 8(b) "Township and Area Development Projects" for the proposed construction of a high rise residential group development building with a built up area of 1, 77, 399.59 sq.m. It is respectfully submitted that all the allegations mentioned therein are denied as false, frivolous and motivated and the appeal is liable to be dismissed.

2. It is respectfully submitted that in the instant appeal, the Respondent No. 3 has filed a counter affidavit with annexure. For the sake of brevity and convenience, the said counter and annexures are adopted by the Respondent No. 4 herein as their objections and documents submitted to the instant appeal. The Respondent No. 4 reserve their right to file an additional counter during the course of this appeal.

In light of the above, it is prayed that this Hon'ble Tribunal may be pleased to take this memo on record and pass further order/s as this Hon'ble Tribunal may deem necessary in the circumstances of the case and thus render justice.

Dated at Chennai on this the 10th day of April, 2026.



COUNSEL FOR RESPONDENTS 3-5

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TRIBUNAL SOUTHERN
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G. MOHANA PRIYA

And 3 ors.

...Appellants

Vs

TAMIL NADU STATE
ENVIRONMENT IMPACT
ASSESSMENT AUTHORITY
(SEIAA)

And 4 ors.

...Respondents

**ADOPTION MEMO FILED
ON BEHALF OF
RESPONDENT No. 4**

RUKMANI VENUGOPALAN
(MS 2380/2017)
Counsel for Respondent Nos. 3-

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