

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI**

**COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 6**

In Ref:

**ORIGINAL APPLICATION NO. 235 OF 2022**

IN THE MATTER OF:

Ramsrikha Sudeshwari Social

Welfare Foundation

...Applicant

Versus

State of Uttar Pradesh and others

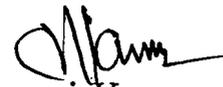
... Respondents

**I N D E X**

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Place: New Delhi

Dated: 18 July, 2022



(Manoj Kumar) Advocate

Counsel for the respondent no. 6

E. No. UP1502/78

COP No.193761

GF-1, Shubh Apartment

489/211 Vivekanandpuri

Faijabad Road, Lucknow-226007

Email-manojkumar.dgm@gmail.com

Note:

Mr. Satya Prakash Singh, Senior Advocate will appear on behalf of Respondent No.6

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI

In Ref:

ORIGINAL APPLICATION NO. 235 OF 2022

Smt. Sabira Khatoon ...Applicant/Res. no. 6

IN THE MATTER OF:

Ramsrikha Sudeshwari Social Welfare Foundation

...Applicant

Versus

State of Uttar Pradesh and others

... Respondents

**APPLICATION FOR DISMISSAL OF ORIGINAL  
APPLICATION**

The applicant/respondent no. 6 named above,  
most humbly submits as under :-

For the facts, reasons and circumstances  
mentioned in the accompanying counter affidavit, it  
is most respectfully prayed that this Hon'ble Tribunal  
may kindly be pleased to dismiss the aforesaid  
original application, in the interest of justice.

Any other order or direction which this Hon'ble  
Tribunal may deem, fit and proper in the facts and  
circumstances of the case may also be pleased to  
pass in favour of the applicant/respondent.

Place: New Delhi

Dated: 18 July, 2022



(Manoj Kumar)  
Advocate

Counsel for the respondent no. 6

E. No. UP1502/78

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH AT NEW DELHI**

**In Ref:**

**ORIGINAL APPLICATION NO. 235 OF 2022**

**IN THE MATTER OF:**

**Ramsrikha Sudeshwari Social Welfare Foundation**

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**Versus**

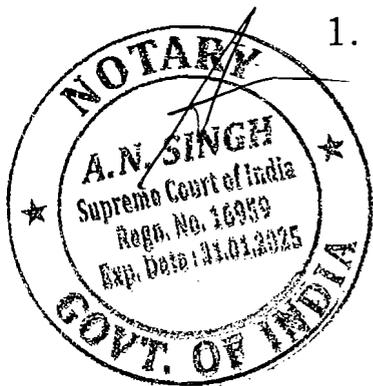
**State of Uttar Pradesh and others**

**... Respondents**

**COUNTER AFFIDAVIT ON BEHALF OF**

**RESPONDENT NO. 6**

I, Smt. Shabira Khaton aged about 70 years wife of Sri Shoeb Ahmad, Religion-Islam, qualification-literate, occupation-stone crashing, the deponent do hereby solemnly affirm and states on oath as under:-



1. That the deponent is at present resident of mohalla-Vivek Nagar, Town-Kabrai, District-Mahoba, (U.P.), and as such she is fully conversant with the facts and circumstances of the case.

2. That the deponent has read over the original

application, and has understood the contents of the instant original application and is well acquainted with the facts and circumstances of the case deposed to here under.

3. That before submitting parawise reply some facts and circumstances are very vital for proper adjudication of the above mentioned original application, which are being mentioned here in below:-

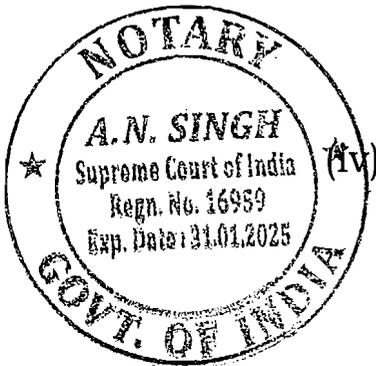
(i) That the husband of the deponent was operated since a long time stone crusher at town Kabrai, district-Mahoba and after death of her husband she become successor of her husband to run the stone crusher plant and other mining lawfull activities.



(ii) That the geology and mining department of the Government of Uttar Pradesh, framed new mining policy 2017 and by which has been decided that all vacant areas of

khanda, Gitti, bolder shall be leased out by way of 'e-tender-cum-e-auction' process for a for maximum period of 20 years and direction were issued to the all district officers vide Government order No. 3236 / 86-2017 dated 12.12.2017.

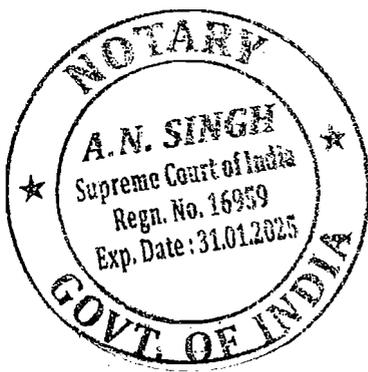
- (iii) That in pursuance of the Government order dated 12.12.2017, the district officer, Mahoba advertised an area of 2.024 hectare situate on gata No. 482 village Sighanpur Baghari for a excavation of 20240 cubic meter quantity of per annum for a period of 20 years from the date of execution of the lease deed in favaur of the highest and satisfactory bidder.



That after believing the suitability of the area as well as available quantity on the area the deponent offered bid of Rs. 317/- (Rupees three hundred seventeen only) for per cubic meter which was found highest

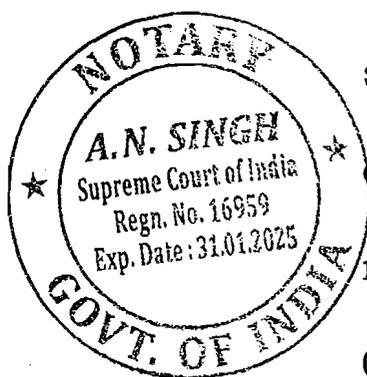
and satisfactory and was provisionally accepted by the district officer, Mahoba and a letter of intent has been issued in favour of the deponent by the district officer, Mahoba by its letter no. 4903 / MMC /E-tender/Sahmati Patra/2018-19 dated 13 August 2018.

- (v) That after receiving the letter of intent dated 13 August 2018, the deponent engaged recognized person for preparation of mining plan and after preparation of mining plan it has been submitted before the director, geology and mining, U.P., Lucknow and who examine the scheme describe in the mining plan the director, geology and mining, U.P., Lucknow accorded its approval on the mining plan and communicated to the district officer, Mahoba, vide its letter No. 1742 / M Plan / 2016 dated 21.10.2018.



(vi) That after getting the approval on the mining plan, the deponent applied for environment clearance in accordance with the EIA notification dated 14.09.2006 before the 'District Level Impact Assessment Authority Mahoba' and after considering the proposal of the EC by the 'district Level Impact Assessment Authority Mahoba' sanctioned the environment clearance by its letter No. 225 / Parya / DEIAA / MAHOBA / 2018 dated 01.12.2018 in favour of the deponent.

(vii) That after obtaining the environment clearance the deponent submitted the stamp paper of Rs. 20,43,120/- for execution of the mining lease deed and mining lease deed was executed on 08.01.2019 for a period of 10 years i.e. upto 07.01.2029 by the district officer Mahoba.



(viii) That the geology and mining, department of

Government of Uttar Pradesh by Government order No. 2644/86-2019-57 (Sa)/2017 TC-1 dated 17.10.2018 communicated the Government decision to the effect that mining leases of the building stone (Khanda, Gitti, Bolder) shall be granted minimum period 10 years and maximum period 20 years.

- (ix) That after execution of the lease deed, date 08.01.2019 the deponent started the mining operation in accordance with the terms and conditions of the lease deed dated 08.01.2019 and she also appointed qualified 'Mines Manager', Shri Dheeraj Kumar Verma, possessing certificate of overman's certificate of competency and Gas Testing Certificate of Competency under the provisions *Coal Mines Regulation, 2017* issued by the Government of India under the provisions of Mines Act, 1952.

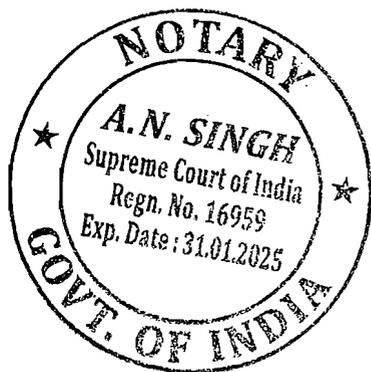


- (x) That the deponent also entered in the agreement with M/s. Himanshu Traders for the purchasing of the material of blasting using in the mining activities in accordance with law.
- (xi) That the son of the deponent namely Sri Atiqe Ahmad vide her application dated 23.01.2021, it has been informed to the district officer, Mahoba that on 30.12.2020, one Sri Arjun Singh Rajawat along with Sri Hukum Singh Yadav met with him at the site and demanded Rs. 5,00,000/- (Rupees five lac) for the contribution in the assembly election but whenever the demanded money was not paid to them, then they collected the farmers of village Singhanpur Baghri and also misguide them on the basis of religion and made quarrel with showing and to wave the weapon and also used the abuse words to his worker then an F.I.R.



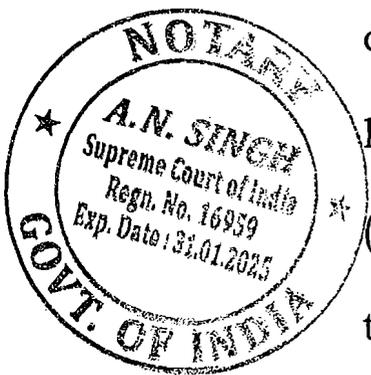
was lodged on 07.09.2021 by one worker Sri Rama Kant Dwivedi Munim of the deponent in the police station-Kabrai against Sri Sarath Vyas and 17 other name and unnamed persons.

- (xii) That the residents of village Singhanpur Baghari have been misguided by some persons who become unsuccessful for obtaining illegal gratification from the deponent or his son and then they started to file the false complaint before the authorities for the harassment of the deponent. It is further submitted that the district administration, Mahoba inquired all false complaint on so many time and taken the measurement of the area but all times the work of deponent was found satisfactory in accordance with law. It is further submitted that on the basis of the protest made by 'Bundelkhand Kisan



Union, Banda' the Commissioner Chitrakoodham Division, Banda also constituted a committee of four members and chairmen was nominated an officer outside the district Mahaba.

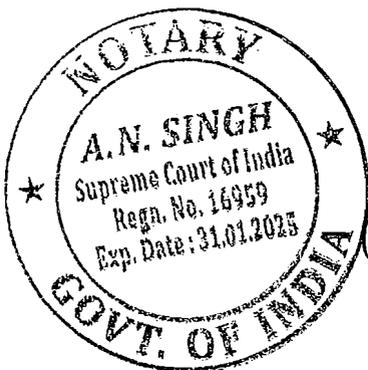
- (xiii) That one Bundelkhand Kisan Union, Banda also made the protest for making inquiry by such officer who posted another district and then the Commissioner, Chitrakootdham, Division, Banda vide its letter dated 20.12.2021 pleased to constitute a committee of four members headed by Additional District Officer (Finance and Revenue) Banda along with three other officers, which enquired all the allegations and situation of the area and thereafter submitted the factual report before the Commissioner, Chitrakootdham Division, Banda vide its letter dated 03.12.2022 in which it has been clearly



mentioned that there is no temple or Devsthan nearby the mining area and the compliant is totally false. It is further submitted that the district officer, Mahoba and superintendent of police, Mahoba also submitted facts finding report before the Commissioner, Chitrakootdham, Division, Banda vide its letter dated 22.12.2021 specially mentioning therein that the lessee /deponent are doing mining operation within the area, granted in her favour on mining lease but local persons are trying to make hurdle for the purpose of illegal gratification only. The complainant after colouring by red colour on one rock lying on such place and thereafter say it is Sidhbaba place, hence it is evident that the complaint made by the villagers along with other person are fake, false and baseless and has filed with the *malafide* intention.



(xiv) That the area granted in favour of the deponent was measured by the said committee of the four members and it was found that 756 cubic meters building stone boulders has been illegally excavated by the deponent and due to this Rs. 12,25,760/- (Rupees twelve lac twenty five thousand seven hundred sixty only) liability was fixed on account of royalty market value of such material and penalty of Rs. 5,00,000/- upon the deponent and the deponent had already deposited such amount in the Treasury Mahoba on 05.01.2022.

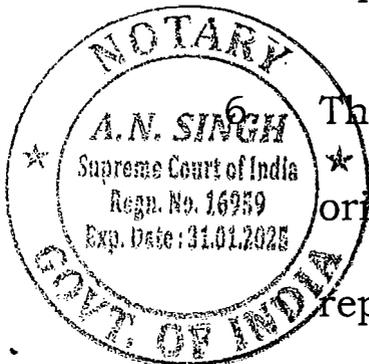


(xv) That in view of above mentioned facts and circumstances in the aforesaid subparagraphs, of this counter affidavit, it is evident that this application also filed by the applicant society before this Hon'ble Tribunal with the *malafide* intention on the false and fabricated ground to harass only

the deponent who is legally authorized to do the mining operation on such area in accordance with law, hence this application is liable to be dismissed on this ground alone, in the interest of justice.

**Parawise reply**

4. That the contents of the sub-paragraph I of the original application are formal, hence need no reply.
5. That the contents of the sub-paragraph II of the original application are formal, hence need no reply.



6. That the contents of the sub-paragraph III of the original application are formal, hence need no reply. However, it is submitted that the deponent is entitled to do the mining operation on the area in question after completing all the formalities, like getting approval on mining plan and environment clearance from the competent authority. It is also respectfully submitted that

the mining lease agreement is not challengeable before this Hon'ble Tribunal under the provisions of Sections 14 and 15 read with Section 18 of the National Green Tribunal Act, 2010 because before execution of the mining lease deed, environment clearance is necessary which has already obtained by the deponent.

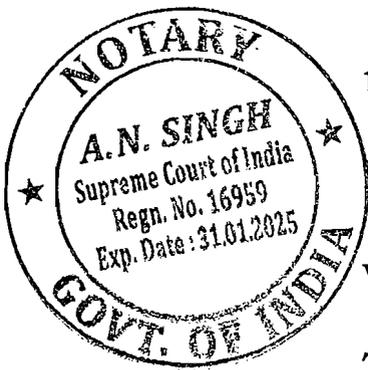
7. That the contents of the sub-paragraph IV of the original application are related to the report dated 03.01.2022 submitted by a committee, of the four member constituted by the Commissioner, Chitrakootdham, Division, Banda. In this respect, it is submitted that such report dated 03.01.2022 is not challengeable before this Hon'ble Tribunal on the ground that it is truly based on the factual situation of the area on ground and if applicant is aggrieved with the aforesaid factual report dated 03.01.2022, then he could made an application again before the Commissioner, Chitrakootdham, Division,



Banda for re-enquiry of the area.

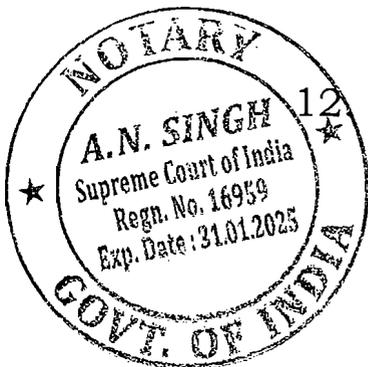
**Facts and brief**

8. That the contents of the paragraph no 1 of the original application is related to the detail of applicant organization and applicant society is registered under the Indian Trust Act, 1882 in district Ghazipur, Uttar Pradesh and its branch office at H-23, Lajpat Nagar, Part-1, New Delhi-110024. It is further submitted that applicant organization is not aggrieved person and the residents of village Singhanpur Baghari are not the member of the such organization, therefore, this application has been filed before this Hon'ble Tribunal as public interest litigation which is not maintainable before the Hon'ble Tribunal under the statutory provisions and liable to be dismissed on this ground alone.
9. That the contents of the paragraph 2 of the original application are formal, hence need no reply.



10. That the contents of the paragraph 3 of the original application are not admitted as alleged. It is submitted that if applicant is aggrieved person with the environment clearance issued in favour of the deponent then it can file the appeal before this Hon'ble Tribunal but the validity of the mining lease agreement could not be challenged before this Hon'ble Tribunal, hence this original application is not maintainable before this Hon'ble Tribunal in the eye of law.

11. That the contents of the paragraph 4 of the original application based on record and are not disputed.

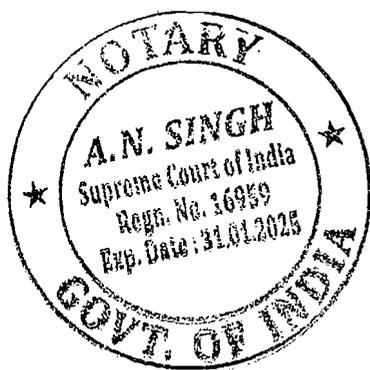


That the contents of the paragraph 5 of the application are based on record and are not disputed. However, it is submitted that the mining lease was granted in favour of deponent after mentioning the area in DSR and mining operation are being done by him in accordance with the law.

13. That in reply to the contents of the paragraph 6 of the original application, it is submitted that committee of four members was constituted by the Commissioner, Chitrakootdham, Division, Banda under the Chairmanship of Sri Umakant Tripathi, Additional District Officer (Finance and Revenue) Banda along with Sri Jitendra Kumar Sub Divisional Magistrate, Mahoba, Sri Ram Pravesh Rai, Circle Officer, (Police), Sadar, Mahoba and Sri Shailendra Singh, Senior Mines Officer, Mahoba. The aforesaid committee enquired all the allegations on 21.12.2021 and 29.12.2021 and after inquiring the matter it has been mentioned in the joint inspection report dated 03.12.2022 that with the help of revenue department both the districts Banda and Mahoba, inquiry and measurement of the leased area has been done on the basis of two wells made separately in gata No. 476 and 481 of village Singhapur Baghari and the distance between two wells is 1750 kadi (350 meter) was



found on the ground and on the basis of record, the 1.00 acre vacant area, which was not sanctioned on mining lease in favour of the respondent no.6 has also been demarcated on the ground and such area is not included in the lease hold area. It is further mentioned that remaining area of one acre is situate nearby the area granted in favour of the deponent but such area is not occupied by the deponent and is laying vacant. Therefore, the assertion made under the paragraph in reply is false and incorrect. It is also submitted that the complaint regarding the bad effect on such prohibited green area and existence of 'Siddh Baba Esthan' Natural Cave system, Natural Flora and Fauna is incorrect and the ground taken by the applicant to this effect is not consistent with the situation found on the ground. It is further submitted that the district officer, Mahoba and superintendent of police, Mahoba, jointly submitted the fact finding report before the



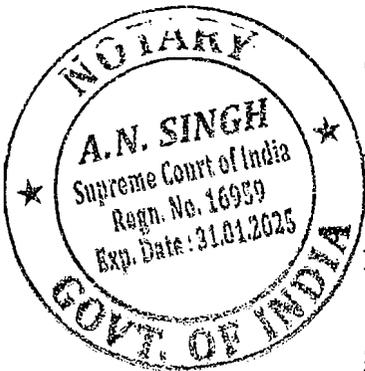
Commissioner, Chitrakootdham, Division, Banda vide its letter dated 22.12.2021, specially mentioning therein that the lessee/deponent are doing mining operation within the area, granted in her favour on mining lease but local persons are making hurdle for the purpose of demand of illegal gratification only and wrongly said that one rock which coloured by red colour themselves is a place of 'Sidhbaba'. Hence it is evident that complaint is without any base and complaint has not been submitted by the aggrieved persons.

14. That in reply to the contents of the paragraph 7 of the original application, it is submitted that the such type of complaint can not be considerable when the area was mentioned in the District Survey Report, Mahoba and after loading it on the 'District Administration Portal' everyone was eligible to submits their objection in writing but any local person or other person



have not filed their complaint or objection for this area and whenever area is settled in accordance with law, in the favour of highest bidder then no one are justified to challenge the grant of such mining lease at this time. It is also pertinent to mention here that the such facts has come into notice of the district administration, that local persons are making hurdles by making false complement for claiming illegal gratification from the lessee.

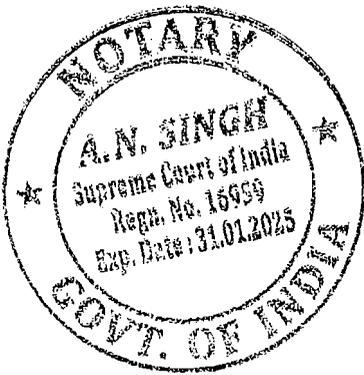
15. That in reply to the contents of the paragraph 8 of the original application, it is submitted that all complaint/ applications received in the office of the district officer, Mahoba has already been inquired properly but no allegation has been found sustainable hence the complainant are guilty to file fake compliant before this Hon'ble Tribunal.



16. That in reply to the contents of the paragraph 9 of the original application, misconceived, hence

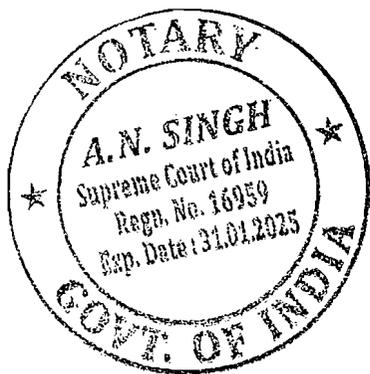
denied. It is submitted that the mining lease was granted in favour of the deponent by way of transparent procedure of e-tender-cum e-auction process, hence the allegation made by the applicant are without any base and emphatically denied. It is also submitted that some resident of village Singhanpur Baghari always disturbed the law and order position of such area by disturbing mining operation of the deponent which are being done by the deponent in accordance with law.

17. That the contents of the paragraph 10 of the application, misconceived, hence denied. It is submitted that 'Siddh Baba Esthan' is situated so far from the lease area in question and mining operation on the area are going on, since a long time near about 25 years but no damage or harm has been appeared due to mining operation on the lease hold area, hence the allegations made under paragraph reply are false



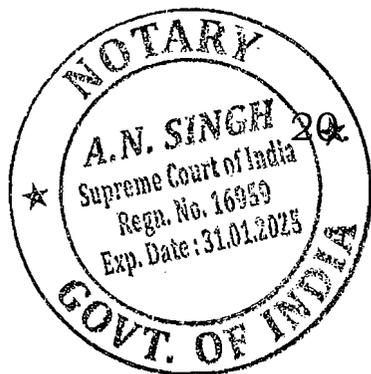
and without support of any ground situation of the area, hence denied.

18. That in reply to the contents of the paragraph 11 of the application, it is submitted that some resident of the village Singhanpur Baghari for the harassing the deponent gathered on the ground, and they made a demand to the administration to stop the mining operation being done by the deponent otherwise some contribution must be provided to the villagers by the deponent. In this respect it is submitted that every lease holder are under obligation to contribute the 10% of the amount of royalty the District Mineral Foundation Trust for maintaining situation of the and the help of the mining effected person.



19. That in reply to the contents of the paragraph 12 of the application, are misconceived, hence denied. It is submitted that the deponent was found to win quantity 756 cubic meters building

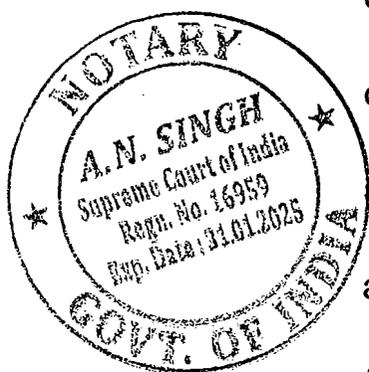
stone outside the area illegally, hence the district officer, Mahoba vide notice dated 03.01.2022 proposed to impose Rs. 1,20,960/- as royalty and Rs. 6,04,800/- as market value and Rs. 5,00,000/- as penalty total amount Rs. 12,25,760/- and the deponent has already deposited aforesaid amount vide challan No. AKV220000432 dated 05.01.2022. Hence it is wrong to say that no necessary legal action has been taken by the competent authority against the deponent which is also not verified by the deponent on the basis of assertion made in the forgoing paragraph of this counter affidavit.



That in reply to the contents of the paragraph 13 of the original application, are related to a news published in the news paper which are not verified by the deponent on the basis of assertion made in the forgoing paragraph to this counter affidavit.

21. That in reply to the contents of the paragraph 14

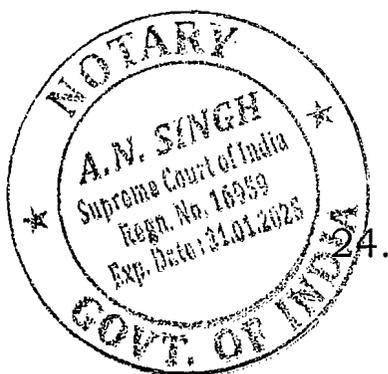
of the application, it is submitted that every citizen have the right to protest for their legal demand in a peaceful manner, however it is submitted that the complaint, regarding mining activities carrying by the deponent properly enquired by the district officer, Mahoba and superintendent of police, Mahoba jointly and committee of four members constituted by the Commissioner, Chitrakootdham, Division, Banda. It is also pertain to mention here that the deponent is authorised to do the mining operation in accordance with the terms and conditions of the lease deed as well as terms and conditions of the environment clearance in a skillful manner and the protest of the villagers are against the lawful work and interference in the mining operation which permitted by the law.



22. That in reply to the contents of the paragraph 15 of the original application, it is submitted that

the Commissioner, Chitrakootdham, Division, Banda and district administration Mahoba along with police department, Mahoba on so many times inquired the complaint in respect of mining done by the deponent but no substance has been found on the complaints mentioned under paragraph reply.

23. That in reply to the contents of the paragraph 16 of the application, it is submitted that the Commissioner, Chitrakootdham, Division, Banda constituted a committee of four members vide order dated 20.12.2021 under the Chairmanship of Additional District Officer, (F&R), Banda and three other officers.



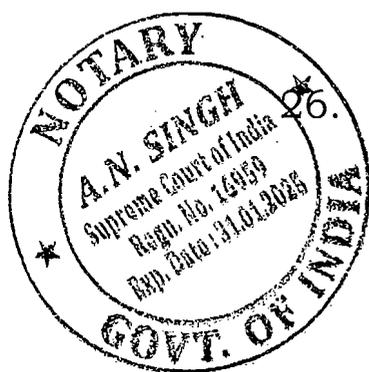
24. That the contents of the paragraph 17 of the original application, are not admitted and are denied. It is submitted that the report submitted by the committee of the four members also indicated that one farmer Sri Sukhdev Singh using the part of khasra no. 485 for growing the

agriculture on the area which has been lease out in favour of the deponent, therefore, it is evident that Sri Sukhdev Singh is unauthorised occupier on the area which has been granted by way of auction in favour of the deponent. It is also submitted that this area was granted since 25 years past on the mining lease but never protest was done by the villagers or other person except at this time.

25. That in reply to the contents of the paragraph 18 of the original application, it is submitted that the the mining plan for the area in question duly approved by the director, geology and mining, U.P. Lucknow on 31.10.2018.

### GROUNDS

That the grounds nos. 1, 2, 3 & 4, mentioned in the original application and taken by the applicant for challenge the mining lease, agreement are not sustainable in the eye of law hence denied. It is submitted that the Mines and



Minerals (Development and Regulation) Act, 1957 fully described the procedure for the grant of mining lease and under the provisions of the Environment (Protection) Act, 1986 the procedure has been laid down for examine the suitability of the any vacant area before granting it on mining lease, and the first requirement is preparation of 'District Survey Report' and also inviting the objection of the effected person or other person and thereafter disposing such objection, if any received, and them the DSR will become final by getting approval of the competent committee. The area in question has already been mentioned in the DSR, Mahoba and deponent before starting the mining operation also obtained environment clearance from the competent authority as well as for the purpose of supervision of the mining operation appointed qualified mines manager and also entered in a contract for obtaining material for blasting by the legally authorised person. It is



also submitted that so many complaint has been received by the authorities and so many time enquiry has been conducted in accordance with law but deponent was not found guilty except to excavate 756 cubic meter building stone from the outside of the area and the district officer, Mahoba vide notice dated 03.01.2022, proposed to impose Rs. 1,20,960/- as royalty and Rs. 6,04,800/- as market value and Rs. 5,00,000/- as penalty total amount Rs. 12,25,760/- and the deponent deposited aforesaid amount vide challan No. AKV220000432 dated 05.01.2022. Hence, it is wrong to say that no necessary legal action has been taken by the competent authority.



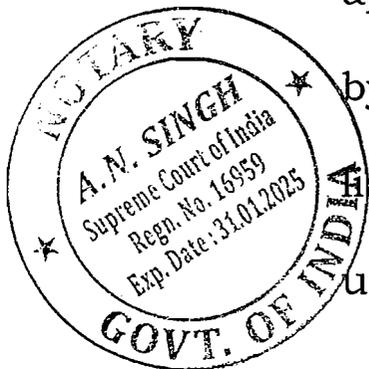
### **LIMITATION**

27. That the averments relating to the limitation of the original application are not admitted as alleged. It is submitted that on the area in question, mining operation are being done near

about since 25 years past but such type of complaint has been filed. After inquiry, the complaints were found unreasonable and unsupported by the law, hence the subjected application is time bared and not maintainable under the provisions of law.

### PRAYER

28. That in view of the facts and circumstances mentioned in the forgoing paragraph of this counter affidavit, the applicant is not aggrieved person and the complaints mentioned by the applicant on the application has not been found sustainable in the eye of law, hence the applicant is not justified for obtaining any relief by this Hon'ble Tribunal and this application is unable to be dismissed by imposing heavy cost upon the applicant.



29. That in view of the above facts and circumstances mentioned in this counter affidavit. It is expedient in the interest of justice

that this Hon'ble Tribunal may kindly be pleased to be dismissed the above mentioned application with cost.

صابرہ ضائقون

Place: New Delhi

**DEPONENT**

Dated: July, 2022

**VERIFICATION**

I, the above named deponent do hereby verify that the contents of paragraphs no. 1 to 29 of this counter affidavit are true to the best of my knowledge, and I have not suppressed any material fact.

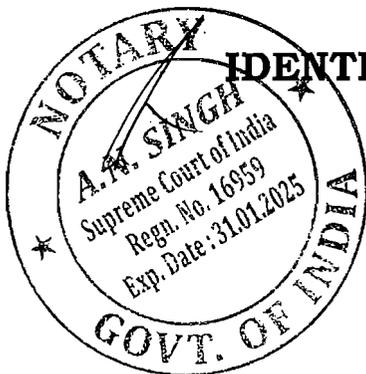
Verified at New Delhi on this 18 JUL 2022... day of

July, 2022

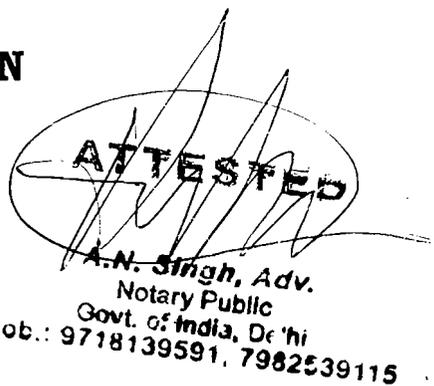
صابرہ ضائقون

**DEPONENT**

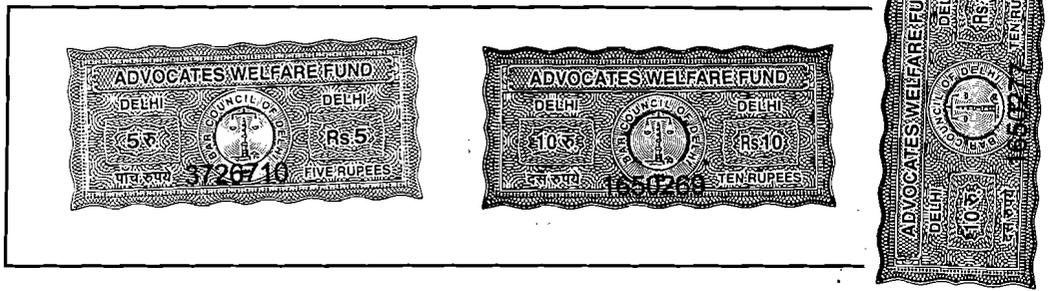
I Identify the deponent who has Signed/Put T.I. in my presence



**IDENTIFICATION**



18 JUL 2022



IN THE COURT OF Hon'ble National Green Tribunal  
Principal Bench at New Delhi  
O.A No. 235 of 2022  
Ram Diksha Sudeshwari Social Welfare Foundation Piff./Petition/Appellant  
Versus  
State of Uttar Pradesh and others Defdt./Respondent

Know all to whom these presents shall come that I/we Smt. Shalisha Khatoon  
aged about 70 years wife of Sri Shoeb Ahmad, R/O Mahalla,  
Villages Nagar Kabra, Mahala the above-named Respondent do hereby appoint,

Sri Manoj Kumar, E.No. UP1502/78 COP No 193761

(hereinafter called the Advocates) to be my/our Advocate in the above-note case and authorise him :-  
To act, appear and pleased in the above-noted case in the Court, or in any other Courts in which the same may be tried or heard and also in the appellate Courts.

To sign, file and present pleading, appeals, Cross-objections or petitions of execution, review, revision, restoration, withdrawal, Compromise or other petitions, replies, objections, or affidavits or other documents as may be deemed necessary or proper for the prosecutions of the said case in all its stages.

To file and take back documents.

To withdraw, or compromise the said case, or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said cause.

To take out execution proceedings.

To deposit draw and receive moneys and grant, receipts there for and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said cause.

To appoint and instruct any other legal Practitioner authorising him to exercise the power and authorities hereby conferred upon the advocate whenever they may think fit to do so.

And I/We, the undersigned to hereby agree ratify and confirm all acts done by the Advocate or his substitute in the matter as my /our own acts, as if done be me/us to all intents and purposes.

And I/We, undertake that I/we or my/our duly authorised agent would appear in the Court on all hearings.

And I/we, the undersigned, do hereby agree not to hold the advocate or his substitute responsible for the result of the said cause in consequence of their absence from the court when the said cause is called up for hearing, or for any negligence of the said Advocate or his substitute.

And I/We, the undersigned, do hereby agree that in the event of the whole or any part of the fee agreed by me / us to be paid to the Advocate remaining unpaid they shall be entitled to withdraw from the prosecution of the said cause until the same is paid up. If any costs are allowed from an adjournment, the Advocate would be entitled to the same.

In witness whereof I/We hereun to set my/our hand to these presents the contents of which have been understood by me/us this.....day of.....

Accepted

MANOJ KUMAR  
G.F.-1, Shubh Apartment,  
489/211, Vivekanandpuri,  
Fajjabad Road, Lucknow-226007

Client Shalisha Khatoon