

BEFORE THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
(ORIGINAL JURISDICTION)

ORIGINAL APPLICATION NO. 1270 OF 2024

IN THE MATTER OF :

IMRAN ALI

..... APPLICANT

VERSUS

MINISTRY OF ENVIRONMENT & ORS. RESPONDENTS

NDOH : 19.05.2025

INDEX

S. No.	PARTICULARS	PAGES
1.	COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 4 – MUNICIPAL COUNCIL, KIRATPUR.	2 – 10
2.	<u>ANNEXURE-CA-4/1</u> : A true copy of the Notice dated 13.08.2013 issued by Municipal Council, Kiratpur.	11
3.	<u>ANNEXURE-CA-4/2</u> : A true copy of memo of Second Appeal No. 330/2020 dated 06.11.2020.	12 – 18
4.	<u>Proof of Service.</u>	19

FILED BY :



(VIKAS KUMAR SINGH)

Advocate for the Respondent No. 4

134, New Lawyer's Chamber,

Supreme Court of India,

New Delhi – 110001.

Mobile : +91 9911111246

Email : v.vlawassociates@gmail.com

New Delhi

Dated : 16.05.2025

BEFORE THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
(ORIGINAL JURISDICTION)

ORIGINAL APPLICATION NO. 1270 OF 2024

IN THE MATTER OF :

IMRAN ALI

..... APPLICANT

VERSUS

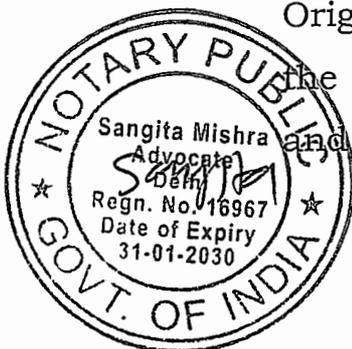
MINISTRY OF ENVIRONMENT & ORS. RESPONDENTS

COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 4

- MUNICIPAL COUNCIL, KIRATPUR.

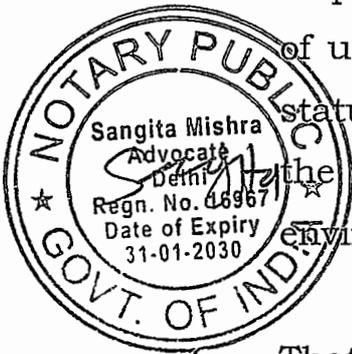
I, Abdul Mannan S/o Late Mohd. Rizwan aged about 43 years, R/o Mohalla-Razdan, Bassi, Kiratpur, Distt.-Bijnor (U.P.), at present Chairman of Municipal Council, Kiratpur, Bijnor, (U.P.) and present in New Delhi do hereby solemnly sate on oath as under :-

1. That the deponent is at present Chairman of Municipal Council, Kiratpur, Distrcit-Bijnor, Uttar Pradesh and is well conversant with the facts of the case on the basis of official records. The deponent is authorized and competent to swear this Counter Affidavit.
2. That the deponent has gone through the contents of the Original Application and has understood the same. At the outset it is submitted that the contentions, facts and averments / allegations made therein, unless and



until specifically admitted, they may be deemed to have been denied.

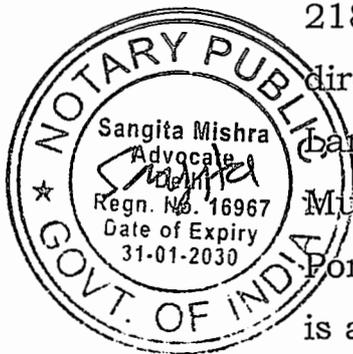
3. That a short affidavit is being filed by the answering respondent at this stage and craves leave and liberty to file a detailed counter affidavit to the aforesaid petition, as and when required.
4. That the applicant has filed the present original application as per revenue record Khasra No. 2181 of Kiratpur, Bijnor a notified pond / waterbody illegally filled with garbage and other materials thereupon encroachment by unlawful construction due to which pond / waterbody vanished regarding which no action by respondent authorities to restrain the construction activity and to remove unlawful encroachment as hand in glove with project proponents as the pond being source of water in monsoon for respite of birds and animals.
5. That in the present matter applicant is praying (a) to stop illegal construction; (b) demolition and prevention of unlawful encroachment; (c) restitution of Pond; (d) status report regarding damage to Pond; and (e) assess the environmental damage & recommend recovery of environmental compensation.
6. That in the revenue record vide Khatauni of 1359 F. i.e., equivalent to year 1951 which is the entry of title and



possession just after abolition of Zamindari Gata No. 2181/1 area 0.759 hectare is recorded as pond and Gata No. 2181/2 area 0.53 hectare is recorded as Punjaba.

7. That a complaint regarding irregularities in the documents of the Pond has been made by some Journalists to the CM Office which was forwarded to the District Administration on which Tehsildar, Najibabad forwarded the same to Executive Officer, Kiratpur on 30.07.2013 as matter is within the Municipality to ensure the Pond's land to free from encroachment.

8. That on 13.08.2013 notice was issued to the then recorded owners of Gata No. 2181 (i) Sri Ramesh Chand, (ii) Sri Suresh Chand both sons of Lalumal, (iii) Sri Rakesh Kumar s/o Sri Vishesh Chand & (iv) Smt. Chandrawati w/o Lalumal stating Pond land Gata No. 2181 has been occupied by you, therefore you are directed to remove your possession from the said Pond land within a period of one month otherwise Municipality will remove your possession from the said Pond Land. A true copy of the Notice dated 13.08.2013 is annexed herewith as **ANNEXURE-CA-4/1**.

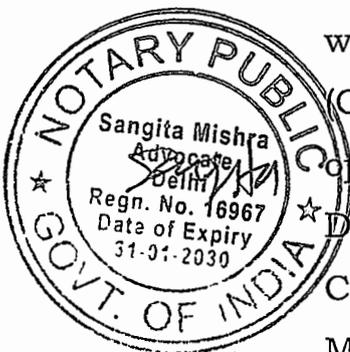


9. That on 06.09.2013 the above-mentioned recorded owners filed a Civil Suit No. 586 of 2013 titled "Ramesh Chand Goel & Ors. Vs. State of U.P. & Ors." before the

Court of Civil Judge (Sr. Div.), Bijnor, Uttar Pradesh seeking a permanent injunction against defendant nos. 1 to 4 where Nagar Palika Parishad, Kiratpur Th. Chairman and Executive Officer, Nagar Palika Parishad, Kiratpur arrayed as Defendant Nos. 3 & 4 respectively.

10. That Defendant nos. 3 & 4 filed written statement in the said Civil Suit specifically pleaded Arazi in question recorded as Banjar & Talab in base year 1359 F. whereas trial court also observed **Khasra in question recorded as Talab and Banjar** but by considering prior and subsequent entries from base year 1359 F. held vide judgment dated 09.12.2015 that the land in question is not a Banjar & Talab (Pond) and prohibited Defendant nos. 1 to 4 causing any disturbance in the ownership and possession and from demolishing the shops, houses etc. of plaintiffs and defendant No. 5.

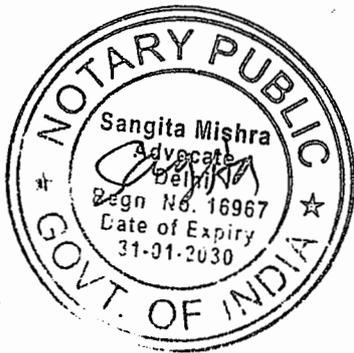
11. That with regard to Judgment dated 09.12.2015 passed by the Court of Civil Judge (Sr. Div.), Bijnor legal advice was taken from the then District Government Counsel (Civil), Bijnor who after examining the files gave his opinion vide his letter dated 17.02.2016 that though Defendant No. 03 Municipal Council, Kiratpur, Th. Chairman and Defendant No. 04 Executive Officer, Municipal Council, Kiratpur defended the case on their behalf before the trial court, accordingly it would be



appropriate for them to file the First Appeal against the judgment dated 09.12.2015 in the Suit.

12. That on 13.04.2016 in pursuance of the advice of the DGC (Civil), Bijnor, the First Appeal No. 14/2018 Nagar Palika Parishad, Kiratpur vs. Ramesh Chandra Goyal etc. was filed in the Hon'ble Court of District Judge, Bijnor on the ground that Arazi in question recorded as Banjar and Talab (Pond) in the base year 1359 F. Further specific issue was framed "*Whether the property in dispute is barren land and land of Pond, if so its effect?*" and the said appeal was dismissed by the Hon'ble Appellate Court on 28.04.2018 holding property in dispute and said land is not barren land or land of Pond.

13. That against the judgment and order dated 28.04.2018 a Second Appeal No. 330/2020 was filed by the Nagar Palika Parishad, Kiratpur Th. Chairman in the Hon'ble High Court, Allahabad, specifically on the ground relying upon the Judgment rendered by the Hon'ble Supreme Court of India in the matter of Hinch Lal Tiwari versus Kamala Devi and Others reported in (2001) 6 SCC 496, wherein all the ponds were directed to be removed from any encroachment or from any possession which is currently pending. A true copy of memo of Second Appeal No. 330/2020 dated 06.11.2020 is annexed herewith as **ANNEXURE-CA-4/2.**



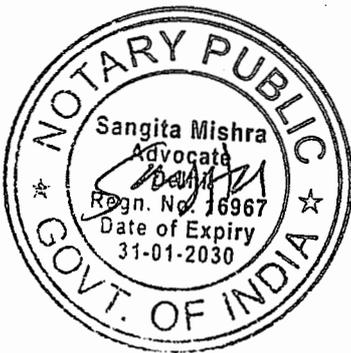
14. That the land in question during pending adjudication was purchased by M/s. Garnish Land Pvt. Ltd. through various deeds from Ramesh Chand son of Lalumal and Rakesh Kumar son of Vashesh Chandra and Chandravati wife Lalumal and firm Lalumal Ramesh chand from partner Akshay Goyal son of Suresh chand.
15. That by these above subsequent purchasers a map was submitted for approval of construction of a commercial complex on the said purchased land by M/s. Garnish Land Pvt. Ltd. The municipality has granted permission for construction on the ground floor of the said land with 23 conditional / restrictions by letter no. 37 dated 07.06.2022 and letter no. 145 dated 27.02.2024 on the following **specific conditions** :

.....

7. *Sanction / permission of Map has no connection with holding.*

.....

16. *If the approval given for the construction in question is obtained by the applicant through fraud or wrong documents, then the approval given under sub-section-(6) of section 180 of the Uttar Pradesh Nagar Palika Act, 1916 shall be cancelled.*



17. *If it is found that the approval has been obtained by concealing the land ownership or any other important fact, the map will be cancelled and the construction done during this period will be considered unauthorised and demolished and compliance of earthquake resistance provisions will be ensured.*

.....

20. *If it is found during or after construction that the commercial market is partially/fully ready on Government land, then the approval / permission given will be considered automatically cancelled.*

.....

22. *There will be no encroachment of any kind on 7590 sq.m. pond land near the proposed construction site.*

23. *Whatever decision is given by the competent court regarding the proposed construction site, this permit will be subject to the decision of the court and the final decision of the competent court will be valid.*

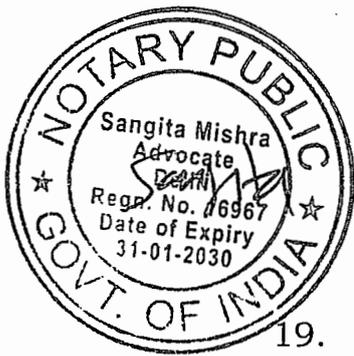


16. That it is humbly submitted the Municipal Council, Kiratpur since inception endeavouring to prevent the encroachment on the Pond land and restore and keep

the existence of Pond Gata No. 2181 being recorded in base year of 1359 F.

17. That it is alleged in the present original application about inaction and hand in gloves of authorities with the private respondents, it is submitted here such allegations are baseless and false as the authorities including respondent no. 4 facing prohibitory judicial pronouncements dated 09.12.2015 & 28.04.2018 which are prevailing till date restraining the authorities from taking any coercive action against the private respondents herein.

18. That further it is submitted here, against the above mentioned prohibitory judicial pronouncements appeal is pending adjudication before the Hon'ble High Court of Judicature at Allahabad, moment it will be set-aside respondent no. 4 undertakes to adopt all measures including demolition for restoration of Pond/waterbody.



19. That further it is humbly submitted as alleged in the present original application there is inaction on part of respondent no. 4 – Municipal Council, Kiratpur Th. Chairman is absolutely wrong and denied as respondent no. 4 is taking all lawful measures within the ambit of law to prevent and restore the existence of Pond / waterbody.

20. That it is humbly submitted that the respondent reserve its right to add-alter and modify the counter affidavit filed by him and to submit further facts, if so necessary in future for proper adjudication of this case.

M. S. Mishra

DEPONENT

VERIFICATION :

16 MAY 2025

Verified at New Delhi on this day 16th May of 2025 that the contents of this affidavit based on official record(s) maintained and information available in the office are true and correct, no part of it is false and nothing has been concealed there from.

M. S. Mishra

16 MAY 2025

DEPONENT

I identify the deponent who has signed/T.I in my presence

Mr./Ms Adv./Self
ID No.
PANo-8 1807911152



ATTESTED

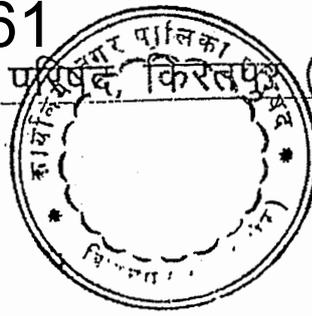
Sangita

Mrs. Sangita Mishra, Advocate
Notary Public, Govt. of India
Mob. No.9990312780

कार्यालय नगर पालिका परिषद, किरतपुर (बिजनौर)

पत्रांक-265 / न0पा0किर0 / 2013-14

दिनांक 13-08-2013



270

1. श्री रमेशचन्द पुत्र श्री लल्लूमल
2. श्री सुरेश चन्द पुत्र श्री लल्लूमल
3. श्री राकेश कुमार पुत्र श्री बशेषचन्द
4. श्रीमती चन्द्रावती पत्नी श्री लल्लूमल

नोटिस

सूचित किया जाता है कि तहसीलदार नजीबाबाद के कार्यालय पत्रांक 54/न0न0 दिनांक 30-07-2013 द्वारा अवगत कराया गया है कि गाटा संख्या-2181 तालाब की भूमि पर आपके द्वारा कब्जा कर लिया गया है। जिसे पालिका द्वारा कब्जा मुक्त कराकर तहसील को अवगत कराना है, क्योंकि प्रकरण अन्दर नगर पालिका है।

अतः आपको इस नोटिस के माध्यम से निर्देशित किया जाता है कि आप उक्त तालाब की भूमि से अपना कब्जा एक माह के भीतर हटाकर तहसील/पालिका को सूचित करें। अन्यथा तहसील/पालिका द्वारा तालाब से कब्जा हटवा दिया जायेगा तथा उसमें होने वाला व्यय आपसे वसूल किया जायेगा। ताकीद जाने।

अभिषेकी अविष्करी
नगर पालिका परिषद
किरतपुर (बिजनौर)

प्रतिलिपि-तहसीलदार नजीबाबाद को उनके कार्यालय पत्रांक 54/न0न0 दिनांक 30-07-2013 के क्रम में इस आशय से प्रेषित कि राजस्व विभाग द्वारा उक्त तालाब की सफाई/चिन्हीकरण कराने तथा थानाध्यक्ष, किरतपुर को आवश्यक पुलिस बल उपलब्ध कराने हेतु निर्देशित करने का कष्ट करें, ताकि अग्रिम कार्यवाही की जा सके।

अभिषेकी अविष्करी
नगर पालिका परिषद
किरतपुर (बिजनौर)

IN THE HON'BLE HIGH COURT OF JUDICATURE AT ALLAHABAD.

SECOND APPEAL NO. 330 OF 2020
(Under Section 100 C.P.C.)

DISTRICT : BIJNOR

1. NAGAR PALIKA PARISHAD KIRATPUR through Chairman, Nagar Palika Parishad, Kiratpur, Kasba and Pargana Kiratpur, Tehsil Najibabad, District Bijnor.
2. Executive Officer, Nagar Palika Parishad Kiratpur, Kasba and Pargana Kiratpur, Tehsil Najibabad, District Bijnor.

—Defendant/Appellants.

Versus

1. Ramesh Chandra Goel S/o Late Laloo Mal, R/o Mohalla Mahajan, Kasba and Pargana Kiratpur, at present R/o C/o Dr. Sandeep Goel, S.D. Puram, Kiratpur, Road, Kasba and Pargana Kiratpur, District Bijnor.
2. Suresh Chandra Goel S/o Late Laloo Mal, R/o Mohalla Mahajan, Kasba and Pargana Kiratpur, Tehsil Najibabad, at present R/o Krishna Banquet Hall, Mohalla Hasanpura, Near Bus Stand, Kasba and Pargana Kiratpur, Tehsil Najibabad, District Bijnor (since deceased).
 - 2/1. Akshay Goel S/o Late Suresh Chandra Goel, R/o 156, Civil Line-2, Judgi Chowk, Pargana, Tehsil and District Bijnor.
 - 2/2. Deepthi Jindal D/o Late Suresh Chandra Goel, W/o Deepak Jindal, R/o U.K.G. Road Bulandshahar.

—Plaintiffs/Respondents.

3. Rakesh Kumar Goel s/o Sri Vashesh Chandra Goel, R/o Mohalla Mahajan, at present R/o Mohalla Hasanpura, Near Bus Stand, Kasba and Pargana Kiratpur, Tehsil Najibabad, District Bijnor.
4. State of U.P. through District Magistrate, Bijnor.
5. Tehsildar, Najibabad, District Bijnor.

—Defendant/Respondents.

Second appeal against the impugned judgment and decree dated 28.4.2018 passed by District Judge, Bijnor in Civil Appeal No.14 of 2018 (Nagar Palika Parishad Kiratpur & another Versus Ramesh Chandra Goel & others), dismissing the appeal filed by the appellants, arising out of judgment and decree dated 09.12.2015 passed by Civil Judge (Senior Division), Bijnor in O.S. No.586 of 2013.

Between

Ramesh Chandra Goel and others.

.....Plaintiffs.

Versus

Nagar Palika Parishad Kiratpur and others.

.....Defendants.

Valuation of Suit	:	Rs.4,00,000/-
Valuation of Civil Appeal	:	Rs.4,00,000/-
Court fees paid, payable and as paid in trial Court and lower appellate Court	:	Rs.502/-

Relief sought is to set-aside the impugned judgment and decree dated 28.4.2018 passed by District Judge, Bijnor in Civil Appeal No.14 of 2018 (Nagar Palika Parishad Kiratpur & another Versus Ramesh Chandra Goel & others) as well as judgment and decree dated 09.12.2015 passed by Civil Judge (Senior Division), Bijnor in O.S. No.586 of 2013.

The objections to the judgments and decrees under appeal are based amongst other on the following :

GROUNDS

1. Because the property Khasra Nos.2181/1 and 2182/2 are registered as pond situated within municipal limit of Nagar Palika Parishad Kiratpur, District Bijnor.
2. Because the alleged claim of plaintiffs/respondent nos.1 and 2 was based on a sale-deed dated 28.3.1974 executed by one *Satya*.

Prakash Sharma S/o Krishna Dutt Sharma, but prior to the sale-deed dated 28.3.1974, the property aforesaid was acquired by State of U.P. and compensation for the said acquisition was also taken by the aforesaid Satya Prakash Sharma on 20.6.1970.

3. Because the plaintiffs' vendor is Satya Prakash had no right to sell the property of pond belonging to appellant on 28.3.1974, after receiving compensation from the State of U.P. in the year 20.6.1970.
4. Because the revenue entries in the name of Satya Prakash do not create any title or right to sell the property of pond.
5. Because the plaintiffs and the defendant no.5 namely Rakesh Kumar Goel i.e. respondent nos.1, 2 and 3 started construction of shops in the aforesaid land, without any title and right.
6. Because on getting knowledge of the said sale-deed and on starting construction by the plaintiff, the present appellants/Nagar Palika Parishad served a notice upon the plaintiffs on 13.8.2013, stating therein specifically that the property in dispute is a pond, therefore ongoing construction being raised over the pond is to be removed on its own by plaintiffs, failing which the same shall be removed forcefully by the present appellants.
7. Because the name of Satya Prakash was wrongly and forgedly recorded in the revenue record, accordingly the entries in Khatauni in the name of either Satya Prakash or in the name of plaintiffs are absolutely forged.
8. Because concerning the property situated at Khasra Nos.2181/1, 2182/2, the suit no.586 of 2013 filed by the respondent nos.1 and 2 against the respondent nos.3, 4, 5 and present appellants, seeking a relief of permanent injunction falsely alleging the ownership and possession of the plaintiffs.

- ✓ 9. Because the suit aforesaid was filed without any mandatory notice under Section 80 of CPC, as such was barred by the provision of Order 7 Rule 11 (d) CPC.
10. Because the aforesaid suit was admittedly filed without any mandatory notice to the present appellants under the provision of Section 328 (1) of U.P. Municipalities Act, 1916, as such was barred by provision of law and the plaint was liable to be rejected under Order 7 Rule 11 (d) of CPC.
11. Because a written statement was filed by the State-defendant nos.1 and 2 vide paper no.49-A, stating therein that the property in dispute is a pond of which the owner is State of U.P. It was further stated in the written statement that in Khatauni of 1359 and 1367 Fasli, the property in dispute is recorded as Banzar land. An additional written statement was also filed by defendant nos.1 and 2 vide paper no.149-A.
12. Because another written statement was filed by the present appellant being defendant nos.3 and 4 vide paper no.62-A, wherein also it is stated that the property in dispute is belongs to pond and is a public utility land.
13. Because the Court fees were insufficiently paid because the valuation of property in dispute is more than Crores.
14. Because the written statement was filed by defendant no.5 who was in collusion of the plaintiffs, was a collusive statement, and was filed for misleading the Court with fraudulent intention.
15. Because the oral testimony of plaintiff no.1 Ramesh Chandra Goel was recorded as PW-1. The statement of a Lekhpal Suresh Chandra was recorded as DW-1 for the defendant nos.1 and 2 and the statement of a Clerk Baburam was recorded as DW-2 for the defendant nos.3 and 4.
16. Because by Fehrist paper no.C-39, a Khasra for the year 1337 Fasli was filed as paper no.40-C/1 to 40-C/2 and a Khatauni of

1359 Fasli was filed as paper no.C-41. The copy of Khara for the year 1359 Fasli was filed as C-43 and a copy of Khatauni for years 1389 Fasli to 1392 Fasli of Khewat No.1 was filed as paper no.C-44 to C-47, C-153, C-154 and C-155, showing the property recorded as Pond/Banzar.

17. Because a notice served by the Executive Officer of Nagar Palika Parishad to the plaintiff-respondents on 13.8.2013 for removing their constructions from the pond situated at Gata No.2181 was issued in compliance to the judgment of Hon'ble Supreme Court in the matter of Hinch Lal Tiwari. In the notice it was specifically stated that the property in dispute is a pond and a Government land in the name of Nagar Palika Parishad Kiratpur. The said notice was also part of record before the trial Court vide paper no.153-Ga.
18. Because the issue no.1 with regard to the ownership and possession of the plaintiffs was illegally and perversely decided in favour of plaintiffs, despite of the fact that the property was recorded as Talab in the Khatauni since long back and the guidelines issued by Hon'ble Supreme Court in the matter of Hinch Lal Tiwari was absolutely kept in corner. In the matter of Hinch Lal Tiwari Versus Kamala Devi and others reported in 2001 (6) SCC 496, wherein all the ponds were directed to be removed from any encroachment or from any possession.
19. Because the plaintiffs have not only encroach the property of the pond in violation of judgment of Hon'ble Supreme Court, but have also started raising construction over the property in dispute in the month of September-2020. They have started constructions by digging the pond land for purposes of construction over the land of the pond belonging to Nagar Palika Parishad. The foundation has already been laid down by them and the construction work is going on in full swing.
20. Because the plaintiffs are raising the constructions in violation of judgment of Hon'ble Supreme Court causing substantial injustice and injury to the property of the pond, keeping the guidelines issued by Hon'ble Supreme Court in corner.

21. Because the suit of the plaintiffs was decreed by the trial Court on 09.12.2015, giving rise to Civil Appeal No.14 of 2018 under Section 96 of CPC before the District Judge, Bijnor, was filed by the appellants, which too was dismissed by the appellate Court vide impugned judgment and decree dated 28.4.2018, in a most arbitrary and illegal manner.
22. Because despite of specific plea raised in the written statement with regard to maintainability of suit under the provision of Section 326(1) of U.P. Municipality Act, 1916 and Section 80 of CPC, was not considered by the Courts below.
23. Because the judgments and decrees impugned in this appeal are against law and facts.
24. Because the trial Court as well as lower appellate Court side-tracked the material evidence, law and the facts, in passing the impugned judgments and decrees. Both of these are not sustainable under law.
25. Because the findings recorded by courts below are either perverse or based on no evidence or are conjectural in nature and are not sustainable either on facts or in law. The decision making process chosen by the appellate Court as well as by trial Court is alien to law rather subversive to law. The Court below failed to exercise jurisdiction vested in it and exercise jurisdiction illegally against the provision of law and dictum of Hon'ble Supreme Court.
26. Because the courts below exercised jurisdiction with material irregularity in passing impugned judgments and decrees which has resulted in substantial failure of justice.
27. Because the facts and law involved in suit or in appeal was not considered despite having been pleaded, argued and shown to the courts below, which has caused substantial failure of justice.
28. Because under the aforesaid facts and circumstances, the impugned judgment and decree dated 28.4.2018

Judge, Bijnor In Civil Appeal No.14 of 2018 (Nagar Palika Parishad Khatpūr & another Versus Ramesh Chandra Goel & others) as well as judgment and decree dated 09.12.2015 passed by Civil Judge (Senior Division), Bijnor In O.S. No.586 of 2013, may kindly be set-aside.

29. Because the following **Substantial Questions of Law** are involved in the present appeal :-

Substantial Questions of Law

- A. Whether the suit of the plaintiffs was maintainable in violation of Section 326 (1) of U.P. Municipalities Act, 1916.
- B. Whether the suit of plaintiffs barred under the provision of Section 80 of CPC.
- C. Whether the suit of plaintiffs barred under the provision of Order 7 Rule 11 (d) CPC .
- D. Whether the suit of plaintiffs could be decreed in violation of strict guidelines in the matter of *Hinch Lal Tiwari reported in 2001 (6) SCC 496* about encroachment of ponds.
- E. Whether mere revenue entries in Khatauni with regard to public utility land/pond belonging to Nagar Palika Parishad, creates any title or right to sell the property.

Dated : 6 / 11 / 2020

(MANU SAXENA)
Counsel for the Appellants
Enrolment No.1 of 1994
Table No.1, Gown Room Verandah
High Court, Allahabad.
Mobile : 9793101020
Advocate Roll No. A/M0376 of 2012
Email : manusaxenahighcourt@gmail.com

369



Vikas Vikram <v.vlawassociates@gmail.com>

OA No. 1270/2024 (Imran Ali versus MoEF)

1 message

Vikas Vikram <v.vlawassociates@gmail.com>
To: chambersofsaaurabhajaygupta@gmail.com

Fri, May 16, 2025 at 4:44 PM

Sir,
Please find enclosed Counter Affidavit on behalf of Respondent No. 4 (Municipal Council, Kiratpur)

thanks & Regards

--
Vikas K Singh, Advocate
V & V Law Associates,
134, M.C. Setalvad Block,
Supreme Court of India,
New Delhi - 110001.
M : +91 9911111246

 **CA on behalf of Respondent No 4.pdf**
1064K