

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

Original Application No. 180 of 2020 (SZ)

In the matter between

T. THANGABAI
w/o C.Thankamony
No.195 Dharga Road
Zamin Pallavaram, Chennai 600043

... Applicant

-versus-

1. THE SECRETARY TO GOVERNMENT OF TAMILNADU
Revenue Department
Fort St. George, Chennai 600009
2. The Secretary to Government of Tamilnadu
Public Works Department
Fort St. George, Chennai 600009
3. The Secretary to Government of Tamilnadu
Environment and Forest Department
Fort St. George, Chennai 600009
4. The Member Secretary
Chennai Metropolitan Development Authority
No.1 Gandhi Irwin Road, Egmore
Chennai 600008
5. The Collector
Kancheepuram District
Kancheepuram 631501
6. The Collector
Chengalpattu District
Chengalpattu 603001
7. SNP Infrastructure LLP
No.680, FNO-203, Regency House
Durga Nagar Colony, Hyderabad 500082
Represented by its Power of Attorney Agent
M/s. Embassy Property Developments Private Limited

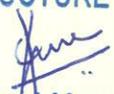
... Respondents

Counter Statement Filed by the 7th Respondent

The above named seventh respondent submits the following.

The address for service of all notices and processes on the above named 7th respondent is that on their counsel M/s. A.Thayaparan and P.Rajendrakumar at 45 Law Chambers, High Court Buildings, Chennai 600104.

For SNP INFRASTRUCTURE LLP


General Manager

1. The seventh respondent herein humbly submits that the present Original Application is liable to be dismissed *in limine* on the preliminary grounds: (i) the subject matter of the present application is beyond the jurisdiction of this Hon'ble Tribunal; (ii) This Application is barred by limitation; (iii) The current application is an attempt at forum shopping and (iv) *The current* application is completely malafide and deserves to be dismissed with costs; (v) The applicant is also not a person aggrieved and the application filed does not even set out clearly how the applicant is aggrieved.

(a) It is submitted that the applicant ever since the year 2007 is having the habit of filing repeated complaints to the Government Authorities and approaching the Courts causing hindrance to the development of (IT/ITES) SEZ project undertaken by this respondent, now has approached this Hon'ble Forum categorically challenging in effect the G.O.No.262 dated 23.05.2008, and the Planning Permission granted in the year 2017 by the 4th respondent which in the first place is hopelessly barred by Limitation and further this Hon'ble Forum has no jurisdiction to set aside the said G.O and the planning permission granted to the seventh respondent. Right from the time the impugned G.Os were issued in 2008 the Seventh Respondent, to the knowledge of the applicant (who is the owner of the property adjacent to the development by the seventh respondent) has acted on the strength of the G.O and in accordance with the permission granted under the said GOs provided alternate channels for draining over flow of water. Therefore, the cause of action for this application if at all is in 2008 and the present application is a clever attempt to camouflage the same. The current is therefore clearly barred by limitation.

(b) It is submitted that the said GO No.262 dated 23.05.2008 was issued by the Revenue Department of the Government of Tamilnadu, granting permission to re-route the field channels, after following all requisite norms and in exchange of it an extent of 50 Cent of lands owned by the 7th Respondent as detailed in the Government Order was handed over to the Government. As per the said G.O.No.262, the surrendered lands were excavated forming deep channels with cement plastering to drain storm water and it was constructed at the cost of the 7th Respondent. The exchange of land by forming re-routed field channels were completed as early in the year 2009 itself and excluding those lands compound wall was built, required SEZ Sanction from the Ministry of Commerce and Industry, Government of India, necessary NOC

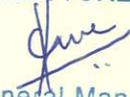
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General Manager

from ELCOT and MSB Planning Permission from CMDA were obtained and the construction of all Ten Blocks are in progress, and construction of Two Towers have been completed, Two Towers nearing completion and the foundation work in six towers are completed and construction is in progress. It is submitted that the entire site measuring an extent of 11.14.7 Hectares have been developed, modified and construction work is in progress as per the specifications of the sanctioned Planning Permission.

- (c) It is submitted that this respondent had earlier applied for Planning Permission with the CMDA (4th respondent herein) as early on 28.02.2008 and this being IT SEZ buildings, the Electronics Corporation of Tamil Nadu Ltd., (ELCOT) had granted NOC dated 14.02.2008, whereby this respondent had the benefit of G.O.Ms.No. 169, Industries (MIE) Department dated 12.09.1996, which entitled this respondent to commence and carry out the construction activities while the Planning Permission with CMDA was under the process of approval. Immediately, thereafter, construction activities were commenced by raising the level of the entire site and the foundation work with construction of three basement level for parking was carried out during 2008 - 2010, but due to commercial reasons arisen out of recession in IT Industry the development of the project was kept on hold temporarily. Later, in the year 2016, the Planning Permission Process with CMDA was renewed and requisite approvals were obtained and the construction activities at the project site were re-started and are in progress since the year 2017.
- (d) The applicant by not disclosing the true facts emanated out of earlier writ petitions W.P.No.33533/2007 and W.P.No.44410/2016, has filed the present application with mala fide intention and ulterior motive to exert pressure on this respondent to heed to the illegal demands of the applicant by causing repeated litigations raising frivolous objections and hurdles in the sanction process. Further not being successful in the earlier attempts through the above stated two Petitions the Applicant has resorted to forum shopping and is agitating the very same issues again in a different form in this proceeding. The admitted facts about the purchase and sale of land by the applicant and her husband to different parties in paragraph 4(b) to (e) of the applicant's petition itself would establish the mala fides on the part of the applicant

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who has been desperately attempting to make huge bargain and ransom from this respondent.

- (e) It is submitted that the applicant is not a person aggrieved as defined in Section 2(j) of the National Green Tribunal Act, 2010. The applicant who is owning a tract of 69 cent of land on the rear side of the SEZ project being developed by this respondent, has mala fide intention as stated supra.
- (f) It is submitted that the Applicant cannot challenge the G.O.No.262 dated 23.05.2008 by invoking the jurisdiction of this Honourable Forum which was constituted subsequently under the National Green Tribunal Act which came into force on 18.10.2010.

BRIEF FACTS OF THE CASE OF THE 7th RESPONDENT

2. This respondent submits that the Applicant is a disgruntled neighbor owning a small stretch of land measuring 69 cent of vacant land adjacent to the 7th Respondent's larger extent of 27.51 acres; and with a mala fide and greedy intent to commercially exploit her property has the habit of filing repeated complaints to various Government Authorities since the year 2007 creating hindrance to the development of (IT/ITES) SEZ project undertaken by this respondent. It is submitted that this respondent has obtained all requisite sanctions, approvals and NOC's from the appropriate Government Authorities by following all the statutory rules and regulations and the construction of buildings is under progress in adherence of all conditions. The applicant who has failed in various attempts since the year 2007, has now approached this Honourable Forum by making false, frivolous and vexatious allegations. The applicant has deliberately suppressed about the fact of earlier round of litigation objecting grant of Planning Permission by filing writ petition W.P.No.44410/2016 before the Hon'ble High Court, Madras, wherein the only grievance of the applicant was that the access to her property was blocked because of the upcoming development project.
3. The Applicant and her family all along were making false complaints that her land was being grabbed and her life was under threat. Finding that all her previous attempts to hinder the SEZ project turned out futile, suddenly after a lapse of nearly twelve years

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had lodged the present complaint inventing new set of accusations and has challenged G.O.Ms.No.262 dated 23.05.2008 issued by the Revenue Department, the first respondent herein.

4. It is submitted that this respondent, as stated earlier, had petitioned to the first respondent on 3.10.2007 and 4.10.2007 requesting to give in exchange their privately owned lands measuring 0.20.00 Hectares (50 Cent) in exchange of dried up field channel measuring 0.19.50 Hectares (48 Cent) running through their site which are classified as channel poromboke with a view to have a contiguous land for development as SEZ. On the basis of the said request the Revenue Authorities examined the possibility of exchange of land and called for Report from the various departments, viz., District Collector and Sub-Collector Chengalpet, Special Commissioner for Land Administration, Executive Engineer, PWD Irrigation Source, Kancheepuram, Tahsildar Tambaram. After inspection of the site the Authorities have recommended for exchange of land and directed this respondent to handover 0.20.3 Hectare of patta land (50 Cent) for formation of channel as per the Rule 26A of the Revenue Standing Order. Further the first respondent directed this respondent to deposit Rs.17.65 lakhs towards expenses for earthwork excavation and to lay cement concrete with 20mm HBC Jelly and gravel backing. Accordingly, G.O.Ms. No.262 dated 23.05.2008 was passed by the first respondent. Pursuant to the said direction this respondent had deposited with the Executive Engineer, PWD (WRO), Kancheepuram a sum of Rs.17,65,000/- by Demand Draft bearing No.896878 drawn on State Bank of India, Madipakkam Branch.

5. As per the Orders of the first respondent the earmarked portion of land of an extent of 0.20.3 Hectares owned by this respondent in the stretch of S.Nos.204/3A, 5A, 182/6, 7, 8, 9, 10, 181/3, 4, 8, 198/8B2, 203/2A, 7A1, 194/2, 3, 4, 6, 7, 8, 9, 11, 12, 13, 195/2, 5 were delivered and handed over to the Government and the same has been classified as channel poromboke. Further, in this stretch of land handed over to the Government, earth excavation work with dimension of 150 cm X 80 cm was done and channel with gravel backing and cement concrete with dimension of 150 cm X 60 cm X 50 cm was done and completed in the year 2009 by the PWD Department as per drawings. This has been done to ensure drainage and free flow of storm water from the northern side to the drainage channel running parallel to Pallavaram-Thoraipakkam Radial Road on the southern side. It is submitted that by virtue of the said initiation a proper and better

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channel to drain storm water has been accomplished. The allegations of the applicant that water bodies were encroached is baseless, false and unfounded.

6. This respondent states that the following chronology of events would put in perspective the illegal and desperate attempts of the applicant in causing hindrance to the development of the site of the seventh respondent with ulterior motive.

Sl.No.	Date	Facts
(i)	23.10.2007	The applicant and her husband filed a writ petition W.P.No.33533/2007 before the Hon'ble High Court, Madras, making false allegations of encroachment of government lands. On the same day the applicant finding that her pleas were not successful withdrew the petition and it was dismissed and liberty was granted to approach appropriate forum.
(ii)	14.05.2009	The applicant had sold a plot of land measuring 1798 sq.ft., naming it as RKV Avenue without obtaining approval or subdivision to one R.Bino Wesley by registered Sale Deed bearing No.1673/2009.
(iii)	12.12.2016	<p>The husband of the Applicant had filed a writ petition W.P.No.44410/2016 before the Hon'ble High Court, Madras, concealing the fact of existing RKV Avenue Road and by making a false allegation that this respondent's project is blocking access to his land and sought to give passage through this respondent's property to reach 200 Feet Radial Road.</p> <ul style="list-style-type: none"> - In this writ petition admittedly, except demanding passage to have access from 200 Feet Road, no other allegation of any sort either encroachment or re-routing of water channel was made. The prayer in the writ petitions was forbearing the CMDA from granting approval of Planning Permission, until ensure and provide link road from 200 Feet Radial Road to the applicant's property. - This writ petition was filed with ulterior and malafide motive to impede the process of Planning Permission that was pending before the CMDA.
(iv)	13.03.2017	<p>The Hon'ble High Court, Madras was pleased to pass an order in W.P.No.44410/2016, giving direction to CMDA to dispose the respondent's application for Planning Permission by considering the objections raised by the Applicant upon revised plan showing access to the applicant's property.</p> <ul style="list-style-type: none"> - Accordingly, the existing access through RKV Avenue was considered by the CMDA, however the greedy intent of the applicant to grab the land of this respondent and to have the access through 200 Feet Radial Road was frustrated.

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(v)		The applicant and her husband disgruntled with their failure to get access from the 200 Feet Radial Road, later approached the Police Authorities by making unfounded allegations.
(vi)	03.07.2017	The Applicant lodged a complaint to Assistant Commissioner of Police, Pallavaram Range making allegations of criminal intimidation to sell her property as against one Shivaji Rao and implicated that he functioned as power agent of this respondent.
(vii)	24.01.2018	The Applicant's son sent a mail to the 7 th respondent company making allegations as against Shivaji Rao.
(viii)	27.01.2018	The Applicant issued a Notice, captioning it as legal notice to the General Manager of this Respondent company alleging criminal intimidation forcing to sell applicant's property through Shivaji Rao.
(ix)	02.02.2018	The General Manager of the 7 th Respondent Company replied to the Applicant refuting all her allegations and informed that the SEZ project has commenced and that the company is not in requirement of the applicant's land and that the company had not appointed Shivaji Rao as their agent to deal with his property.
(x)	10.09.2018	The Applicant's son again sent a mail to the 7 th respondent company making allegations as against Shivaji Rao stating that he misused the esteemed name of the 7 th respondent organization.
(xi)	09.10.2018	The Applicant's son again sent a mail to the 7 th respondent company making allegations as against Shivaji Rao.
(xii)	10.10.2018	The 7 th Respondent company had replied in detail stating that <ul style="list-style-type: none"> - Shivaji Rao is not the Agent of 7th Respondent and was not engaged to deal with petitioner. - Planning Permission was obtained from CMDA and started construction and that the applicant's land cannot be included in the ongoing SEZ sanctioned project. - 7th Respondent is not interested in the acquiring applicant's land.
(xiii)	10.10.2018	Applicant's son again sent mail to the 7 th Respondent making the same allegations.
(xiv)	11.10.2018	The 7 th Respondent company once again replied to the applicant reiterating the facts that Shivaji Rao is not an agent of the company.
(xv)	15.04.2019	The Applicant had issued a notice to Shivaji Rao marking a copy to the 7 th respondent company.
(xvi)	27.05.2019	The Applicant's son again sent a mail complaining about Shivaji Rao.
(xvii)	07.06.2019	The Applicant had sent complaints to several Government Authorities making wild allegations that her land is being grabbed by land mafia and that there is a threat to her life and a copy of it

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		was marked to the 7 th Respondent company.
(xviii)	17.06.2019	The Applicant's son again sent a mail alleging that the applicant's property is being grabbed by Shivaji Rao and personally implicated the General Manger of the 7 th Respondent company.
(xix)	19.06.2019	A complaint was given by C.P.Subash General Manager of the 7 th Respondent Company to the Deputy Commissioner of Police, St.Thomas Mount, Chennai against Applicant & her son Darwin, and alleging criminal intimidation.
(xx)	08.07.2019	A complaint was lodged before the Judicial Magistrate Alandur, by C.P.Subash, General Manger of the 7 th Respondent company as against the Applicant making allegation that - The applicant demanded to give 2 Acres of land in road front in exchange of her 69 cent of land and that the applicant keep threatening & intimidating.
(xxi)	24.08.2019	Now the Applicant as counter measure has started to make frivolous allegation to the Government Agencies, very particularly to the Assistant Development Commissioner of MEPZ-SEZ at Tambaram, this time alleging that encroachment of land and re-routing of water bodies.
(xxii)	26.09.2019	The Assistant Development Commissioner for MEPZ-SEZ had issued a notice to the 7 th Respondent calling for response from our company on the complaint of the Applicant.
(xxiii)	11.10.2019	The 7 th Respondent company had replied to the Assistant Development Commissioner for MEPZ-SEZ by enclosing all copies of sanctions, planning permissions and connected records.

With Regard to Other Allegations made in Original Application, this respondent states the following:

7. With regard to the allegations of the Applicant made in paragraph 4 (f), (g) & (h) that in the year 2007 the 7th respondent started encroachment of water channels (vaikkal poromboke) adjacent to her site, encroached water channel passing near applicant's land by raising seven feet high concrete compound wall, subsequent to filing of writ petition 33533/2007 the illegal encroachments in water channel near to the applicant property was removed and therefore the applicant did not proceed further are all denied by this respondent as false and concocted version to cover up the false allegations and lapses on the part of the applicant. The further allegation of the applicant that to grab the water channels this respondent approached the Revenue Department and obtained G.O.No.262 dated 23.05.2008 without any valid justification or genuine reason in the guise of Special Economic Zone are all denied as false and baseless allegations. The allegation of the applicant that the said G.O.No.262 dated 23.05.2008 was issued by the Revenue Department on the basis of false and misleading statements are denied by this respondent.

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8. The further allegation of the applicant made in paragraph 4 (i) of the Application that the DRO of Kancheepuram District in collusion with this respondent had made blatant falsehood statement in his Report about the then status of the land is false and baseless allegation. It is submitted that the authorities concerned have made inspection of the site and verified all the revenue records and the same were referred in the Reports of the concerned Authority. Admittedly, the Revenue Department and the CMDA had classified the subjected lands and its surroundings including the land owned by the applicant as Industrial Zone enabling to construct commercial and residential units. It is also significant to note that the DRO's report has not been challenged by the Applicant in any manner known to law till this date.

9. With regard to the allegations of the applicant in paragraph 4 (j) It is submitted that the applicant has deliberately and knowingly made false statement that she was doing agricultural activities from the year 1985 simply by citing three four trees in her property. It is submitted that the attitude of the applicant and her husband transacting their land in pieces, forming unapproved layout and selling small plot of land naming it as RKV Avenue and causing hindrance to the development of adjoining SEZ project demanding way through the privately owned land of this respondent to reach 200 Feet Radial Road suppressing the available access through RKV Avenue on the rear side would evidence the mala fide intent of the applicant and her husband. It is submitted that the applicant, her husband and son demanded the applicant company to provide Two Acres of land in the Road Front of 200 Feet Radial Road in exchange of their tract of 69 Cent of land on the rear side; and with that greedy intent the applicant continue to cause stumbling blocks by making repeated frivolous petitions to the Government Authorities and have been instituting legal proceeding abusing the process of law.

10. It is submitted that in the previous litigation objecting grant of Planning Permission by the CMDA, the applicant had falsely alleged that access to her property was blocked and sought passage from the 200 feet Radial Road across the privately owned land of the 7th respondent. The sanctioning authorities rejected the illegal demand of the applicant having found that access through RKV Avenue is available. In the said litigation raised by filing writ petition W.P.No.44410/2016 before the Hon'ble High Court Madras, the applicant had addressed her grievance that the access to her property alone was

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blocked and the issue of G.O.No.262 was not raised, though the applicant was aware about the passing of the said G.O., and the sanction of SEZ in favour of the 7th Respondent. It is unfair on the part of the applicant to now approach this Hon'ble Forum causing another round of litigation questioning the reports of the Government Authorities which was examined in the year 2008.

11. With regard to the allegations of the applicant in paragraph 4(k) & (l) that the applicant's private lands are situated in between the lands of this respondent and that the DRO statement is contradictory are misleading and false statements of the applicant. It is submitted that the 7th respondent property being developed is contiguous and having access through 200 feet Pallavaram Thoraipakkam Radial Road. The applicant's land is having access through Pallavaram RKV Avenue Road. This alleged dispute of blocking the access to the applicant's property was raised and settled in the earlier round of litigation through W.P.No.44410/2016 on the file of Hon'ble High Court Madras. The attitude of the applicant once again raising the same issue before this Hon'ble Forum indicates that the environmental issue has been raised in a flimsy fashion by the applicant to invoke the jurisdiction of this Hon'ble Court to re-agitate the closed issue.
12. With regard to the allegations of the applicant in paragraph 4(m) & (n) raising non existing contradictions in the internal communications between the PWD and CMDA and Revenue departments, this respondent submits that the applicant cannot invoke the jurisdiction of this Hon'ble Forum. Further, it is submitted that there is no contradictions or violation of any Rules or error in the procedures adopted by the Government Agencies.
13. With regard to the allegations and references made by the applicant about the Tamil Nadu Protection of Tanks and Eviction of Encroachments Act 2007 and judgment of Hon'ble Supreme Court by the applicant in paragraph 4(o), (p) & (r), this respondent states that all those points raised by the applicant are misconceived out of context and have no application to the present case at all. This respondent submits that there was no encroachment of any water bodies as alleged by the applicant. It is submitted that in fact by re-routing the levelled up field channels and construction of proper channel with cement mortars, the drainage of storm water around the site has been augmented and

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properly maintained. It is submitted that no water body as described by the applicant was in existence and that few stretch of field channels classified as poromboke land was there and after urbanization necessarily the re-routing and construction of channels to drain storm water has been undertaken and completed.

14. With regard to the allegation of the applicant made in paragraph 4(q) contending that the CMDA had illegitimately approved Planning Permission to this respondent by blocking the natural flow of water is baseless and false allegation. I state that regarding the approval of Planning Permission by the CMDA, the applicant cannot agitate before this Hon'ble Forum and as stated supra it is beyond the scope and jurisdiction of this Hon'ble Forum. In any case there is no irregularity in grant of the planning/building permission as alleged or at all. It is submitted that the SEZ project being carried out by this respondent is not blocking the natural flow of water. As stated supra proper channel work were excavated and completed as per the G.O.Ms.262 dated 26.05.2008 and the same has augmented the flow of storm water drain into the newly formed drainage channel down the 200 Feet Radial Road.

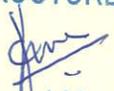
15. With regard to the allegations of the applicant made in paragraph 4(s) that the exchange of lands did not serve the purpose of diverting water during rainy season and floods and that the G.O., was intended only to satisfy selfish act of the corporate against principle of natural justice and ecological balance are all flimsy allegations without any basis or proof. As stated above this respondent submits that the authorities concerned have exercised their power diligently for sustainable growth and development and proper channel way has been formed to drain storm water around the site.

16. With regard to the Grounds raised by the applicant in paragraph 5 (a) to (g) this respondent reiterates the following.

(a) The allegation of the applicant that this respondent encroached many water channels in between the patta lands is utter falsehood and the applicant is called upon to prove the same. It is reiterated that this respondent has not encroached or blocked any water channel either inside or around the SEZ Tech Zone.

(b) Again, the allegations of the applicant that this respondent had altered the natural drainage pattern and encroached the water channel doing construction work on it causing environmental disputes that involve multi-disciplinary issues, ecosystem,

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contour levels, landscape, slope of the site, landform and terrain characteristics are wild and imaginary allegations without any basis. There is no iota of truth in such allegations of the applicant. The 4th respondent CMDA is appropriate authority to consider all these aspects and after due consideration of all relevant topography the Planning Permission has been accorded stipulating all just and necessary conditions.

- (c) The development of SEZ project at the site of this respondent is carried out by following all Development Control Rules and Regulations of the Authorities concerned. As stated above this respondent has not encroached any water channel either inside or outside the site. In and around this site numerous multi-storeyed commercial and residential development projects has been completed and in progress. The applicant with ulterior and personal motive has been making false allegation of encroachment of water channels. Attributing the respondent's development that during rainy season the surrounding areas got flooded and rain water gets stagnant in houses and streets is not only mala fide but also utter falsehood.
- (d) The reference of floods during 2015 due to unprecedented rain is just a flimsy version to cause prejudice as against this respondent.
- (e) This respondent submits that the applicant has with mala fide intentions has caused several petitions to the Government Authorities and also through fictitious resident associations. It is submitted that there is no iota of truth or genuineness in the complaints of the residential associations and the same were issued at the instigation of the applicant with mala fide intent.
- (f) Admittedly, the applicant contends that all those channels re-routed were originally decades back used for irrigation in the fields as "field channels". Decades back agriculture activities were stopped and the entire area has become urbanized and the CMDA has classified the Pallavaram Zone as Industrial and Residential Zone. It is submitted that no water body was encroached as alleged and it was re-routed and the drainage of storm water was further augmented and properly routed.
- (g) The ground of Public Trust Doctrine and alleged violation of Article 14, 21, 48A and 51A cannot be raised and adjudicated by the applicant before this Hon'ble Forum.

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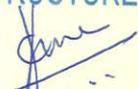

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17. It is submitted that as per the conditions laid down in the said G.O.No.262 dated 26.05.2008, an extent of 0.20.3 Hectares of land was handed over to the Revenue Department and under the supervision of the PWD Authorities the work of laying new channels in the marked route with prescribed specifications and cement concrete plastering were done providing free flow of rain water from northern side to southern side without any hindrance. It is submitted that the new channel runs through the boundary of the applicant's property and in fact it was once the applicant had made illegal attempts to close the newly formed channel to widen the access to her property.
18. It is submitted that the applicant has been abusing the process of law to cause repeated disturbances to the 7th Respondent in proceeding with their development of SEZ Project with greedy intent to force the 7th Respondent to pay huge ransom. The exchange of letters, mails, its contents and tenor would evidence the mala fide on the part of the applicant and her family members. Having failed in many attempts by making wild allegations as against the General Manager of the 7th Respondent company that her land was being grabbed and that her life and family members life is under threat, also made false allegation that her land is locked without access and now after twelve years the applicant has invented a new concocted version challenging the lawfully obtained sanctions from the Government Authorities.
19. With regard to case laws referred by the applicant in her pleadings, this respondent submits that they are not relatable to the facts and circumstances of the dispute raised by the applicant. It is submitted that citing of case laws in the pleadings of the Original Petition are not permissible and this respondent craves leave of this Hon'ble Court to permit this respondent to respond to it at the time of physical hearing of the case. This respondent also reserves its right to file appropriate petition and/or response to the Report of the Committee formed by this Hon'ble Forum.

It is therefore prayed that this Hon'ble Forum may be pleased to dismiss the application with exemplary costs and thus render justice.

Dated at Chennai on the day of April, 2021.

For SNP INFRASTRUCTURE LLP


General Manager

Counsel for 7th Respondent

7th Respondent

Verification

We, M/s. SNP Infrastructure LLP, represented by its General Manager and Authorised Signatory Mr.C.P.Subash, do hereby verify and declare that the facts stated above from paragraph 1 to 19 are true to the best of his knowledge and belief.

Verified and dated at Chennai on the day of April, 2021.

For SNP INFRASTRUCTURE LLP


General Manager

7th Respondent