

BEFORE THE HON'BLE NATIONAL GREEN TRICUNAL, SOUTHERN
ZONE AT CHENNAI
MEMORANDUM OF APPLICATION
(Under Section 18(1) read with Sections 14 and 15 of National Green Tribunal Act,
2010)

Application No.104 of 2024 (SZ)

BETWEEN

Mr.R.Thangavel, M/65 Years,
S/o. Late Rathinavel
Door No.121, Raja Nagar,
Gandhi Road, Kallakurichi District,
Kallakurichi- 606 202.
Cell No.99449 96356.
Email:-kavithahardwaresklk@gmail.com

... Applicant

AND

The District Collector and 4 others

... Respondents

VOLUME-II

S. No.	Date	Description of Documents	Page No.
1.	03-07-2024	Objection filed by the Applicant	1-2
2.	26-06-2024	Photograph	3

It is certified that the above mentioned documents are true copies.

Dated at Chennai on this the 3rd day of July 2024.


Counsel for the Applicant

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, SOUTHERN
ZONE AT CHENNAI

MEMORANDUM OF APPLICATION

(Under Section 18(1) read with Sections 14 and 15 of National Green Tribunal Act,
2010)

Application No.104 of 2024 (SZ)

BETWEEN

Mr.R.Thangavel, M/65 Years,
S/o. Late Rathinavel
Door No.121, Raja Nagar,
Gandhi Road, Kallakurichi District,
Kallakurichi- 606 202.
Cell No.99449 96356.
Email:-kavithahardwaresklk@gmail.com

... Applicant

AND

1. The District Collector,
District Collector Office,
Kallakurichi District-606 202.
Contact No.04151-228802,
Email:-collr-kki@gov.in

2. The Chairman,
Tamil Nadu Pollution Control Board,
Anna Salai, Guindy, Chennai -600 032.
Contact No.044-22353134-139,
Email:-grievance@tnpcb.gov.in

3. The Commissioner,
Kallakurichi Municipality,
Kallakurichi District-606 202.
Contact No.04151-222272,
Email:-commr.kallakurichi@tn.gov.in

4. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
District Collectorate Master Plan Complex,
Backside of Taluk Office, Villupuram-605 602.
Contact No.04146-259955
Email:-tnpcbvpm@yahoo.co.in

5. Mr.Nagarajan,
Door No.120, Navaneethammal 1st Street,
Raja Nagar, Kallakurichi Town,
Kallakurichi District-606 202.

... Respondents

OBJECTION FILED BY THE APPLICANT AGAINST THE 3rd RESPONDENT REPORT

The Applicant above named most respectfully begs to submit as follow:-

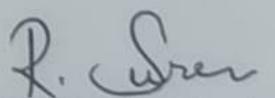
1. The Applicant submits that the 3rd Respondent failed to conduct the inspection properly. The inspection team led by Marley, visited the premises to instruct the 5th Respondent to seal the pipeline, but no proper action was taken. The 3rd Respondent failed to take steps against the illegal disposal of sewage water, including human excreta, into the public drain. Despite numerous notifications to the concerned authority, no significant action was taken. The inspection report and photographs clearly show the illegal disposal of sewage water. It is evident that the inspection team failed to take proper action. The main issue at hand is whether the 3rd Respondent removed the pipeline and took appropriate remedial action.

2. The 3rd Respondent filed a status report that is totally incorrect and contains false statements, claiming that the pipeline has been removed. However to date the pipeline has not been removed, and this fact is continually being obscured by the 3rd Respondent in favour of the 5th Respondent.

3. The Applicant annexed the latest photograph dated 26/06/2024, it is clearly shows that the pipeline has not been removed from the 5th Respondent house and he is still disposing of sewage water, when the 3rd Respondent is absent from conducting a field inspection. Moreover, the 3rd Respondent has only superficially conducted a field inspection, so both of them are colluding and trying to deceive.

It is most humbly prayed that this Hon'ble Tribunal may be pleased to pass an order to direct the 3rd respondent to remove the pipe line running 4 ft in length from the 5th Respondent house is illegally and deliberately draining sewage water, including human excreta, in to the public storm water drain and in the interest of justice.

Dated at Chennai on this the 3rd day of July 2024.


Counsel for Applicant



BEFORE THE HON'BLE NATIONAL
GREEN TRICUNAL, SOUTHERN
ZONE AT CHENNAI

MEMORANDUM OF APPLICATION

(Under Section 18(1) read with Sections 14
and 15 of National Green Tribunal Act,
2010)

Application No.104 of 2024 (SZ)

BETWEEN

Mr.R.Thangavel, M/65 Years,
S/o. Late Rathinavel

... Applicant

AND

The District Collector and 4 others

... Respondents

VOLUME-II

R.SURESH (Ms. No.506/2007)

V.VIMALA (Ms.No.1332/2003)

G.T.THOLKAPPIAN (Ms No.1896/2012)

N.MAHENDRA BABU (Ms No.2787/2013)

Counsel for the Applicant

Cell No.73051 39841.