

**BEFORE THE NATIONAL GREEN TRIBUNAL,
(SOUTHERN ZONE), SITTING AT CHENNAI**
Original Application No. 191 of 2024

**&
(I.A. No. 71 of 2024)**

IN THE MATTER OF:

**Yelahanka Puttenahalli Lake and
Bird Conservation Trust (Regd.)**

....APPLICANT

VERSUS

The State of Karnataka & Ors.

...RESPONDENTS

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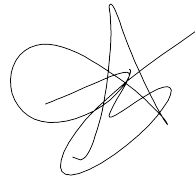
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Date: 24.10.2024

Place: CHENNAI

Through



**Yelahanka Puttenahalli Lake and
Bird Conservation Trust (Regd.)**

ABDUL AZEEM KALEBUDDE

Advocate for the Applicant

Ph: +91-9899474399

email: kalebudde.azeem@gmail.com

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**OBJECTIONS TO THE OFFICIAL MEMORANDUM DATED
26.07.2024 ISSUED BY THE PRINCIPAL CHIEF
CONSERVATOR OF FORESTS (WILDLIFE) & CHIEF
WILDLIFE WARDEN, KARNATAKA (PCCF) AND THE
RE-JOINDER AFFIDAVIT ON BEHALF OF THE APPLICANT**

1. The Applicant is filing the present original application before this Hon'ble Tribunal under section 18 of the National Green Tribunal Act, 2010 (hereinafter referred as "the Act"), herein the situation has arisen giving rise to the substantial questions relating to the environment, as referred to in section 14 of the Act, and the same requires adjudication by this Hon'ble Tribunal. Further, there is damaged caused to the environment by the activities of the Respondents and the same requires the restitution of the environment, as contemplated under section



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15 of the Act. Hence, the present original application is filed before this Hon'ble Tribunal.

2. That this Hon'ble Tribunal *vide* its Order dated 18.06.2024 was pleased to issue notice, in following terms:-

“5. Considering the gravity of the issue, we issue notice to the respondents through the Tribunal as well as privately.”

3. Further, it was categorically submitted by the PCCF that no permission was obtained. And the notice has been issued to BBMP under the provisions of the Wildlife (Protection) Act, 1972 and further action will be taken in accordance with law. That this Hon'ble Tribunal in its Order dated 18.06.2024 has observed as follows:-

“14.Activity of digging up of earth and laying of pipeline including hume pipes within the reserved area already carried out by respondents no. 2-BBMP and/or respondents no. 6- BWSSB will also be subject to further orders to be passed by this Tribunal after hearing the concerned/ aggrieved parties.”



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4. Further, this Hon'ble Tribunal *vide* its Order dated 18.06.2024 had categorically restrained the Respondents No. 2 and/or Respondent No. 6 from carrying out digging up earth and laying of pipeline. This Hon'ble Tribunal has further directed the Respondents No. 2 and/or 6, as follows:-

“14. and they are also directed to take requisite remedial measures to prevent discharge of sewage into the lake.....”

5. It is submitted that the Respondents Nos. 2 and 6 have violated the order passed by this Hon'ble Tribunal and the sewage water has been flowing unabated because BBMP and BWSSB has not taken any steps to stop the sewage water flowing into the lake. Further that the sand bags which were put up to stop the sewage water, have been removed. The flowing of the sewage water into the Puttenahalli lake has been reported in the newspaper, **Deccan Herald** dated 19.10.2024 (Bangalore Edition at page 3D) under the title *“Sewage continues to flow into Puttenahalli Lake despite NGT order”*, wherein it is reported that the Hon'ble NGT directed the BBMP and BWSSB to stop sewage from entering the lake and prohibited further digging.



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In response, the BBMP initially blocked the SWD with sandbags, but however, the sandbags were removed leading to a renewed flow of sewage.

(A true copy of the newspaper **Deccan Herald** dated 19.10.2024 (Bangalore Edition at page 3D) under the title *“Sewage continues to flow into Puttenahalli Lake despite NGT order”* is herein annexed as ANNEXURE A-13) (pages **19 to 20**)

(A true copies of the Photographs taken in the month of October, 2024, showing the continuous flow of sewage water into the Puttenahalli Bird Conservation Reserve, are herein annexed as ANNEXURE P-14) (pages **21 to 26**)

6. Thus, it is submitted that the Respondents herein have deliberately violated the Order dated 18.06.2024 passed by this Hon’ble Tribunal and have committed the contempt of Court.
7. It is further submitted that the Respondent No. 4/Karnataka Forest, Ecology and Environment Department filed its Report dated 03.07.2024. Wherein, it is stated as follows:-

“12. It is submitted that BBMP and BWSSB are in communication with the Forest Department and are in



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the process of submitting a suitable DPR. Necessary action will be taken as per law by the answering Department on the application filed by BWSSB.”

8. That the Respondent No. 6/ BWSSB filed its Report dated 28.08.2024, but surprisingly has not submitted nor has made any mention about any DPR regarding the laying of hume pipeline for the purpose of draining the waste water. Whereas, BWSSB has merely surmised without any empirical data and has merely given the problems faced by itself in containing the sewage water. It has not addressed any issues which are detrimental to the Puttenahalli Bird Conservation Reserve. The relevant paragraphs of the said Report dated 28.08.2024 are as follows:-

“7. The major part of Puttenahalli lake catchment comes under CMC limit & the sewage generated in these catchments are conveyed & treated in the exiting 7 MLD Puttenahalli WwTP (Waste water Treatment Plant) now (Functioning at its maximum capacity). The 2 MLD sewage from the Ananthapura Village coming under 110 villages will be conveyed through the ISPS located in the



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premises of existing Puttenahalli WwTP to the already functioning 10 MLD Allalassandra WwTP.

8. *That in the original scope of the said project, sewage from the remaining portion of Ananthapura Village (110 Villages) area is proposed to lead off through the lateral UGD pipeline already laid in the catchment area which in-turn connects to the proposed Sub-Mains in the Attur lake bund along the buffer zone of storm water drain (SWD) up to Century Commanders Vista apartment and thereby providing Lifting Machine hole (Man hole) at the Cross Road junction of Century Commanders Vista Apartment towards newly established machine hole near Duo Marvel Layout in the Ananthapura Main Road connecting to the proposed 6 MLD Yelahanka Kere WwTP.”*

It is submitted that the above statement clearly shows that there is no need to utilise the area of the Puttenahalli Bird Conservation Reserve to lay the sewage pipeline by the BWSSB. Moreover, the said project is being implemented without there being any Detailed Project Report (DPR) and the



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same is done only on trial and error basis, at the cost of the environment, by causing permanent damage to the same. Hence, the said proposal ought to have been rejected by the Respondent No. 4/Karnataka Forest, Ecology and Environment Department.

9. It may be noted that the BBMP *vide* its Letter dated 28.06.2024 made a request for laying 1.6m hume pipeline for diversion of storm water mixed with sewage as a precautionary measure to prevent contamination of Puttenahalli lake.
10. It is submitted that the Principal Chief Conservator of Forests (Wildlife) & Chief Wildlife Warden, Karnataka (PCCF) *vide* its Official Memorandum dated 26.07.2024 has erroneously accorded permission to the BBMP and BWSSB to lay the proposed 1600 mm storm water hume pipeline and 700 mm dia trunk sewer pipeline along with necessary structures so as to prevent the entry of sewage/contaminated water into the Puttenahalli Bird Conservation Reserve. It may be noted that the present laying of the hume pipeline in Conservation Reserve is of no help unless there is a proper channel constructed upstream and the said area is beyond the



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jurisdiction of BBMP and BWSSB. The fact has been considered by the PCCF in its Official Memorandum dated 26.07.2024, as follows:-

“So, from the above calculation it clearly shows that 700 mm diameter of sewer pipeline will suffice the sewage generated by the year of 2051 for the population of 78312 nos. Additionally, significant developmental activities are occurring upstream, beyond the jurisdiction of BWSSB and BBMP. As a result, the sewage load projected above by BESSB does not account for these developing areas. Therefore, as these areas are developed, it is essential to establish a proper underground drainage (UGD) network and treatment facilities. Without these provisions, the proposed network may not be adequate to handle future sewage loads. Therefore, it is crucial for BWSSB to immediately implement the proposed sewage network plan in the upstream catchment areas of Puttenahalli Lake to ensure the lake’s long-term survival. Also, the BDA and panchayat authorities are required to submit their future



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action plans regarding their sewage network and WwTP.”

Hence, in view of the above, the PCCF ought not to have accorded permission to the BBMP and BWSSB and the same is contrary to law. It is further, submitted that the present proposal, if implemented, would cause immense environmental degradation and as well would totally destroy the Puttenahalli Bird Conservation Reserve.

11. It is submitted that the Applicant has worked proactively for past 11 years for rejuvenation and protection of the Yelahanka Puttenahalli Lake (YPL) and is deeply concerned by the developments post April 2024 as they are going to jeopardize the various efforts taken to protect the lake till date. Yelahanka-Puttenahalli Lake (hereinafter referred to as “YPL”) is part of the Yelamallappa Chetty series of lakes in Bengaluru, flowing eastwards and joining Dakshina Pinakini River, a tributary of Cauvery river. It was declared a Bird Conservation Reserve in 2015 and is managed by the Karnataka Forest Department (KFD). Spread over 37 acres, it serves as a crucial habitat for migratory and local birds and



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supports breeding of several bird species. Due to change in land use leading to increase in human population density around the lake and its catchment area coupled with absence of adequate sewer systems with STP, YPL had become a receptacle for sewage generated in the said area. By 2012 the situation at the lake had deteriorated alarmingly.

12. It is submitted that the Applicant was created in April 2013 for the purpose of conservation and restoration of the YPL. The Trust largely consists of retired professors and other respected members of the society who are interested in conservation and preservation of the environment. It has been working with the government and several state agencies towards the protection, restoration and rejuvenation of YPL. Due to the persistent efforts of the Trust and other civil society members, groups and the Upa-Lokayukta, the lake was taken up for rejuvenation by the state government in 2015.
13. The Applicant actively participated in the formulation of the DPR for the rejuvenation of the lake by the Lake Development Authority. Based on inputs from the Applicant, Indian Institute of Science and GKVK etc., a diversion drain was designed and



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constructed to divert the sewage being received from Yelahanka New Town Phase V by storm water drain BP137 and from Ananthpura by stormwater drain BP135, both at the south-western edge of the lake. The DPR was ready in October 2015 and the work for rejuvenation of the lake was carried out in 2017-2018. Steps taken in the project resulted in stoppage of sewerage ingress to the lake which helped in rejuvenation of the lake.

14. The DPR under the heading *“Compliance to the proceedings of the LDA technical committee meeting held on 21-09-2015”* clearly states that *“The inlet on the western side of the lake is the main nala coming from the outlet of the Attur lake, most of the time the nala will be empty apart from the waste water connected to the nala from the few packets of the catchment & other inlet will be connecting from the south-western portion of the lake (YPL) to the main nala (from New Town V phase) before entering to the lake which is the main source of pollution entering the lake.”*
15. Further, since 2019 the Applicant has helped in developing tree and shrub cover at the lake premises focused on evolving a



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sustainable ecosystem for the migratory birds. The area between the walking path and the lake edge on the north side of the lake has been specially developed carefully with trees and plants in a planned manner. This flora has matured and is home to many insects and birds. The Applicant-Trust regularly carries out de-weeding campaigns to keep the lake premises free of invasive weeds both aquatic as well as terrestrial. It also carries out regular surveys to record the flora and fauna in the premises, water tests for the lake as well as awareness campaigns around the lake ecosystem.

The current action of BBMP is not only detrimental to the long term sustainability of the lake, it is also in violation of the directives of the Hon'ble High Court of Karnataka passed in W.P. No. 7319/2020 (LB-BMP) PIL *vide* its Order dated 01.12.2021 (see **Annexure A-6**).

- 16 Also, the activities during laying of the pipeline is going to destroy the flora ecosystem created between the walking path and the edge of the lake by the hard work of the Trust alongwith KFD and volunteers in the last 5 years.



17. The current action of BBMP constructing a new SWD and forcing it through the north side of the lake is detrimental to the sustainability of the lake. The alignment of the new SWD is not the natural alignment of water flow from Attur Lake to Puttenahalli lake. The design of the new SWD is deficient and will lead to perennial problems of flooding of the lake and neighbourhood and ingress of sewage into the lake. Constant flow of sewage in SWD.
18. The natural alignment of the water path from the Attur lake outlet at the north east edge of the Attur lake to the Puttenahalli lake is at the inlet at the south-west of the Puttenahalli lake, the site of the beginning of the diversion drain. Both BBMP and Lake Development Authority records show this alignment of the drain ending at the south-west end of the lake as BP135. However, BBMP started making a new SWD terminating at the north-central edge of lake premises on an entirely new alignment and have started calling it “BP135”.
19. The origin of the BP135 is at the Attur lake outlet across the tank bund road and has a reducing cross section- it reduces from 15.00x2.40M to 4.00x2.40M. This portion of SWD is



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joined to a SWD from the north, Ananthpura side at approximate chainage 150M. Cross section width of the drain from Ananthpura is also about 4M (Not given in the BWSSB drawing). After joining these two SWD streams, the combined SWD turns south, its cross section becoming 4.00x3.50M at chainage 200M and then **reducing** to 3.00 x 2.40M at chainage 275M onwards. So, it is seen that the two streams of about 4M cross section join together and then instead of increasing the cross section to handle additional flow, the cross section reduces to less than that of a single stream.

20. So, despite the two streams- one from Ananthpura side and another from Duo Marvel layout side joining in, the newly laid SWD cross section remains the same 3.00 x 2.40M for a distance of over 700M. Just before this junction, the SWD width reduces considerably, as it has to be accommodated in the basement of an existing building- Blue Sky apartments.
21. The submission of engineers of BWSSB and BBMP to KFD, as brought out in para 3 at page 3 of the order of the KFD is wrong, as the original alignment of BP135 is available for taking the flow of water on gravity basis. Further contention of



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BBMP and BWSSB that no damage to the physical nature of the pathway will be there is misleading as this pathway will have at least a dozen manholes with separate chambers for the SWD and the sewage pipe being laid. As such it will disturb the existing nature of the pathway. The work itself will destroy the floral ecosystem developed along with the pathway in the past 5 years.

22. All the storm water drains converging to Puttenahalli lake have a constant ingress of sewage. This has been the state of affairs for years and the same continues as there are no STP upstream of YPL. Even the Puttenahalli STP doesn't cater to all the sewage which comes in SWD BP137 from the Yelahanka New Town Phase V. YPL rejuvenation could be done by designing and constructing a diversion drain on the south and south-east side of the lake, along with a passive treatment plant. However, bringing BP135 SWD to the north-central part of the lake instead of the original south-west alignment of lake will make it prone to sewage ingress from the junction of the SWD and underground pipe as well as from the various joints and manholes in the path.



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23. Therefore, it is humbly submitted that this Hon'ble Tribunal by applying precautionary principle in order to prevent further damage to the environment including the Birds Conservation Reserve and loss of human lives, may be pleased to issue permanent injunction against the construction, in the interest of justice, and thereby may be pleased to:-

- a. Quash the permission granted by Respondent No. 4-PCCF *vide* Official Memorandum No. PCCF(WL)/D/CR-01/2014-15 dated 26.07.2024, to the Respondents No. 2-BBMP and Respondent No. 6-BWSSB, for laying down the hume pipe in the Puttenahalli Bird Conservation Reserve; and
- b. Direct the Respondents herein, and in particular direct the Respondent No. 2-BBMP and Respondent No. 6-BWSSB, not to carry out any activities in and around the Yelahanka-Puttenahalli Bird Conservation Reserve and Lakes, including any activities relating to digging up the earth or putting up any type of pipeline including laying down of hume pipes;



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- c. Issue orders to the Respondents and in particular to the Respondents No. 2-BBMP and Respondent No. 6-BWSSB, to restore the damage/degradation done to the Yelahanka-Puttenahalli Bird Conservation Reserve and Lakes and to completely stop any activities in the buffer zone/green areas, in and around the said Conservation Reserve and Lakes; and
- d. Issue orders granting compensation for causing damage to the environment in and around the Yelahanka-Puttenahalli Bird Conservation Reserve and Lakes and to the same be utilised for the protection of bio-diversity of the Puttenahalli and Yelahanaka Lakes and to ensure protection of aquatic life, flora and fauna, and
- e. Grant such other relief/reliefs as this Hon'ble Tribunal deems fit in the facts and circumstances of the case, in the interest of justice.



ATTESTED

G.P. Chaya

G.P. CHAYA

NOTARY, GOVT. OF INDIA, BANGALORE

No. 4, A Sector, Opp. Canara Bank,
Yelahanka New Town Bangalore-560064

[Signature]
APPLICANT

**Yelahanka Puttenahalli Lake and
Bird Conservation Trust (Regd.)**

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Sl.No. 707 Page 7
Roll 23 Date 24/10/2024
24 OCT 2024

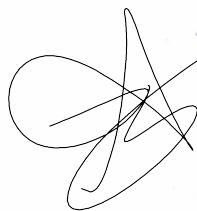
VERIFICATION:

I, Dr. K. S. Sangunni, Chairman, Yelahanka Puttenahalli Lake and Bird Conservation Trust (Regd.), Reg No. BNG(U)YLNK/BKIV/13/2013-2014 #9, 1st Mani, Vinayaka Layout, Puttenahalli, Yelahanka, Bengaluru- 560064, Karnataka, do hereby verify that the contents of paras I to IX are true to my personal knowledge and paragraphs 1 to 23 believed to be true on legal advice and that I have not suppressed any material facts and I believe the same to be true and correct to the best of my knowledge and belief.

Date: 24.10.2024
Place: CHENNAI


APPLICANT

Through



Yelahanka Puttenahalli Lake and
Bird Conservation Trust (Regd.)

ABDUL AZEEM KALEBUDDE

Advocate for the Applicant

Ph: +91-9899474399

email: kalebudde.azeem@gmail.com



ATTESTED



G.P. CHAYA
NOTARY, GOVT. OF INDIA, BANGALORE
No.4, A Sector, Opp Canara Bank,
Yelahanka New Town, Bangalore-560064

18

24 OCT 2024

Sewage continues to flow into Puttenahalli Lake despite NGT order



Sewage flows into the Yelahanka Puttenahalli Lake Bird Conservation Reserve on Friday. DH PHOTO

19/10/2024

Bengaluru, DHNS

Four months after the National Green Tribunal (NGT) ordered the Bangalore Water Supply and Sewerage Board (BWSSB) and the Bruhat Bengaluru Mahanagara Palike (BBMP) to prevent sewage from entering the Yelahanka Puttenahalli Lake Bird Conservation Reserve, sewage-mixed stormwater continues to flow into the lake.

During a visit on Friday, *DH* observed sewage gushing into the lake from layouts in the northwestern part through a newly built stormwater drain (SWD). The stench was pervasive, and the 500-metre walking path had become unusable due to digging work for the hume pipe installation.

The BBMP had constructed the SWD to prevent flooding in Attur and surrounding areas. However, the drain ends abruptly at the lake boundary. Officials began relaying urine pipes along the lake's walking path without securing clearances from the Forest Department. After heavy rains in early June, sewage began flooding into the lake.







Following a complaint by the Yelahanka Puttenahalli Lake Bird Conservation Trust, the NGT on June 18 directed the BBMP and BWSSB to stop sewage from entering the lake and prohibited further digging. In response, the BBMP initially blocked the SWD with sandbags. However, according to a resident, the sandbags were removed last Sunday, leading to a renewed flow of sewage, worsened by recent rains.

BBMP Chief Engineer BS Prahlad claimed he was unaware of the sandbag removal, but stated that the SWD was intended only for rainwater runoff, not sewage.

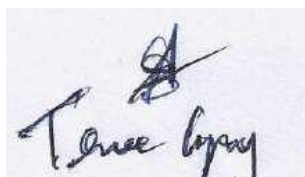
No end to violations

Despite regulations prohibiting construction within 15 metres of a stormwater drain (SWD), an apartment has been built just one metre from the new drain, discharging brackish water into it. BBMP officials promised to investigate these violations, but the BWSSB has not responded to inquiries about the water discharge.

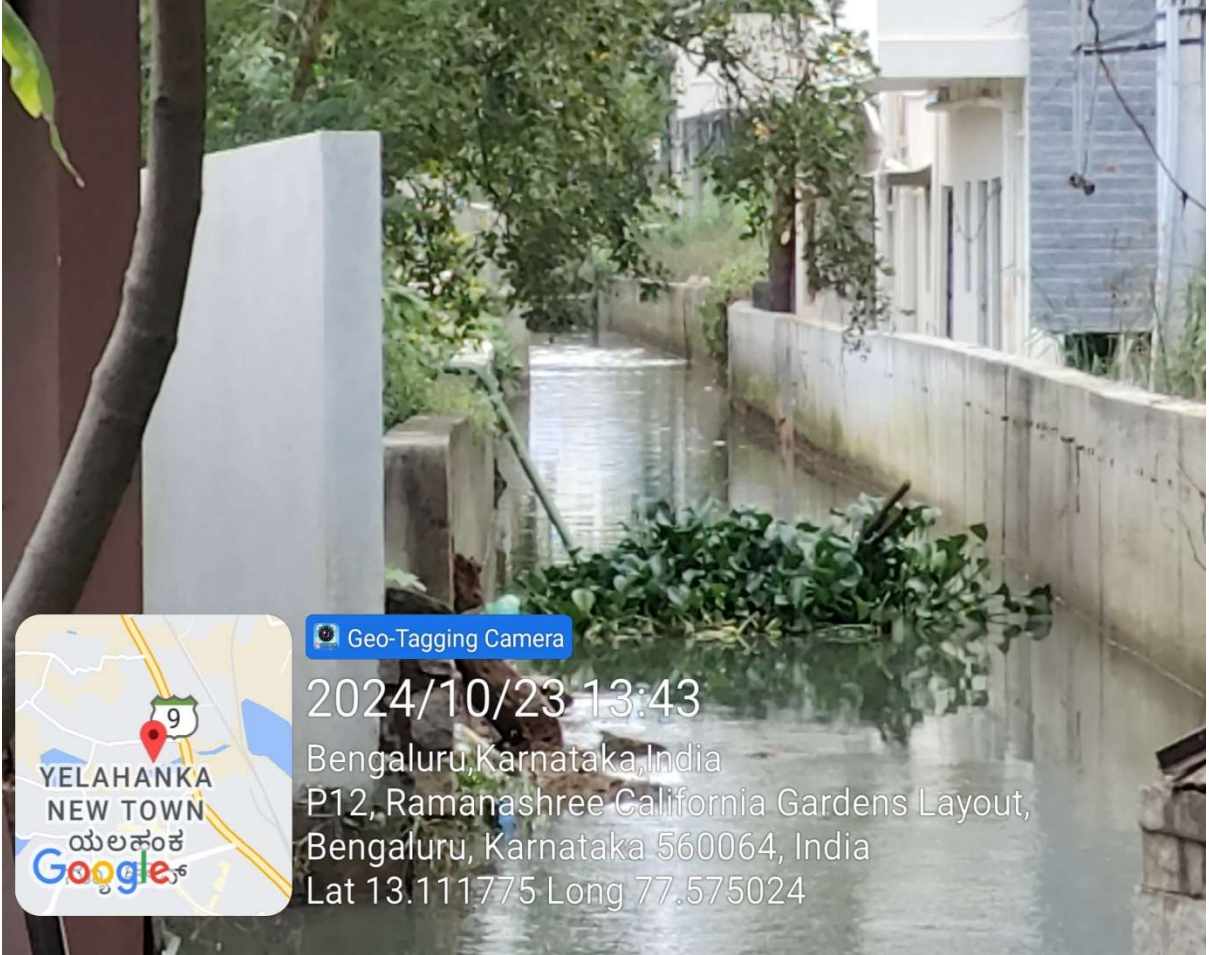
A conservationist criticised the BBMP's "unscientific work" and the BWSSB's failure to stop sewage discharge, lamenting that the government's Rs 6-crore investment in the bird reserve is being undermined. "We are witnessing its slow death," he warned.

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PHOTOGRAPHS



**Photo taken: Date 23.10.2024, Time: 13:43 hrs,
Place: Yelahanka, Bengaluru, Karnataka**

T. Anurag



**Photo taken: Date 23.10.2024, Time: 13:43 hrs,
Place: Yelahanka, Bengaluru, Karnataka**

T. Anurag

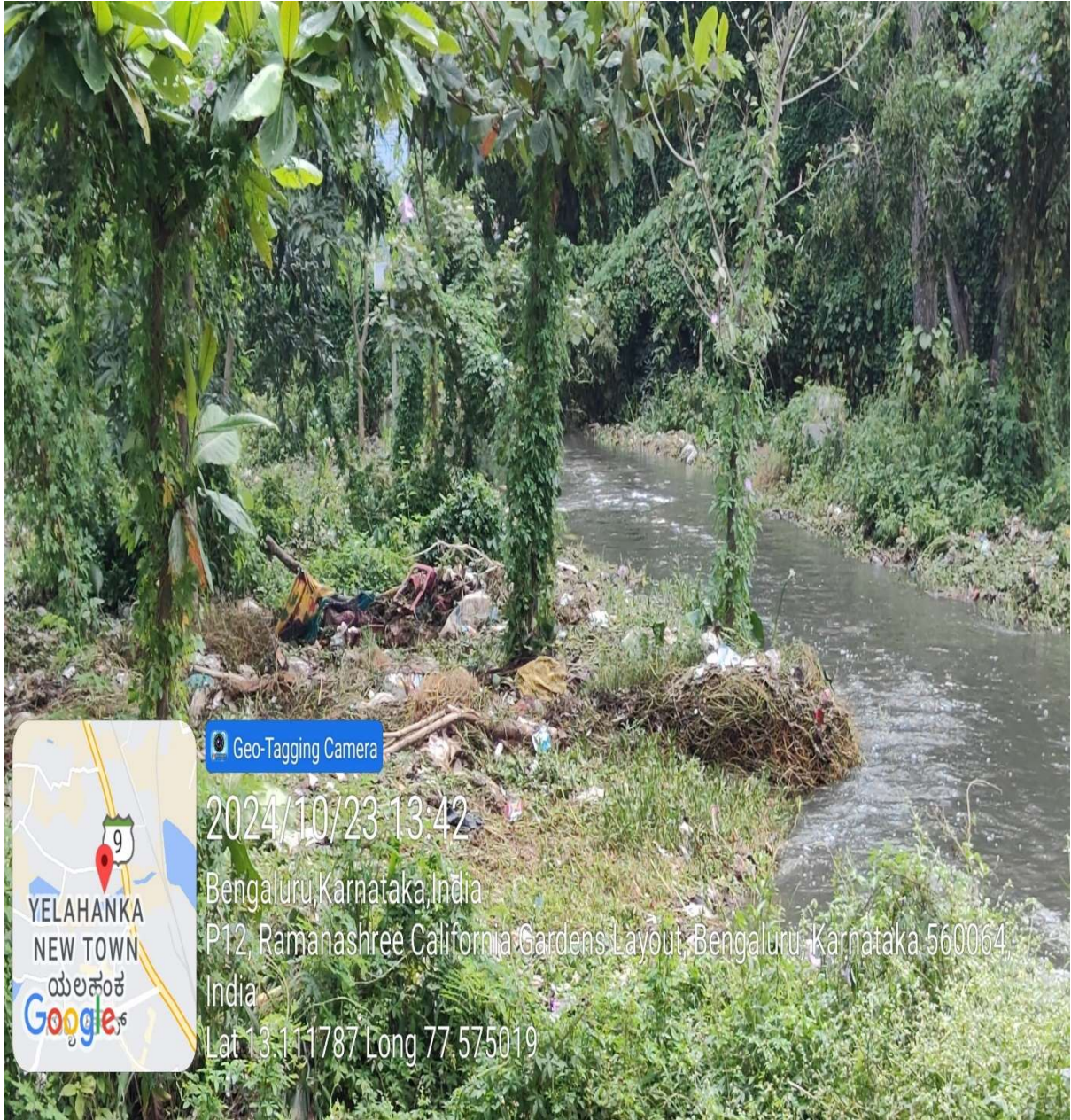


**Photo taken: Date 23.10.2024, Time: 13:41 hrs,
Place: Yelahanka, Bengaluru, Karnataka**



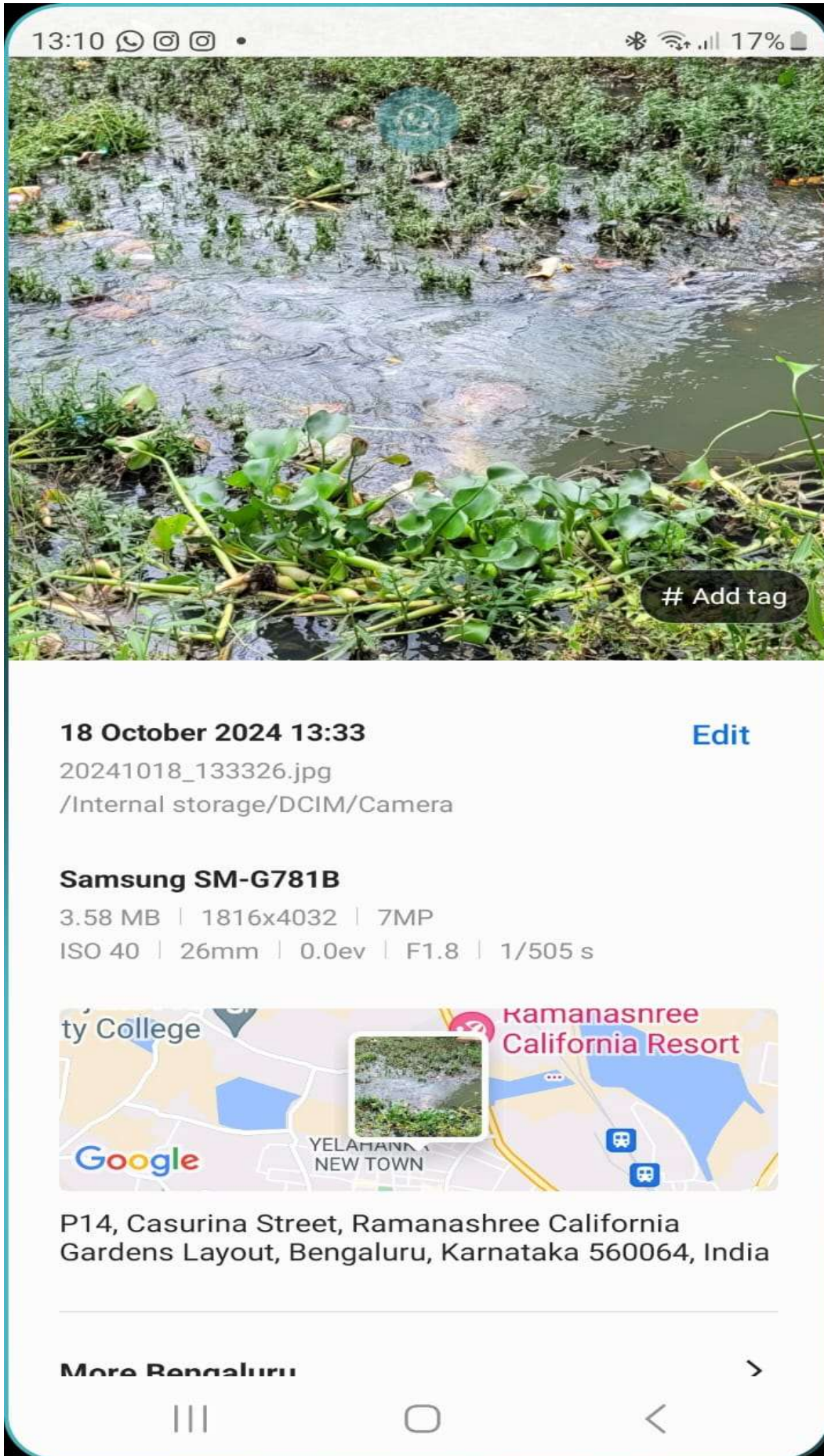
**Photo taken: Date 23.10.2024, Time: 13:41 hrs,
Place: Yelahanka, Bengaluru, Karnataka**

T. Anurag



**Photo taken: Date 23.10.2024, Time: 13:42 hrs,
Place: Yelahanka, Bengaluru, Karnataka**

T. Anurag



T. Anurag

**Photo taken: Date 18.10.2024, Time: 13:33 hrs,
Place: Yelahanka, Bengaluru, Karnataka**

**PROOF OF SERVICE****27**

abdul azeem Kalebudde <kalebudde.azeem@gmail.com>

OA No. 191 OF 2024 & IA NO. 71 OF 2024- YELAHANKA PUTTENAHALLI LAKE AND BIRD CONSERVATION RESERVE REDG V/S. STATE OF KARNATAKA AND ORS.

1 message

abdul azeem Kalebudde <kalebudde.azeem@gmail.com>

24 October 2024 at 13:34

To: cs@karnataka.gov.in, contactusbbmp@gmail.com, secyforest-fee@karnataka.gov.in, "pccfwl@gmail.com" <pccfwl@gmail.com>, chairman@kspcb.gov.in, chairman@bwssb.gov.in, msseiaakarnataka@gmail.com, ceolda2002@gmail.com, Vasanth HK <vasanthhk72@gmail.com>, tvsekar12@rediffmail.com, darpan.advocate@gmail.com
Cc: judicial-ngtsh@gov.in

Respected Sir/Madam,

Kindly find attached herewith the Objections/Rejoinder, on behalf of the Applicant, in the above captioned matter.

Kindly acknowledge the receipt of the same.

Thanking you,

--

Yours Sincerely,

Abdul Azeem Kalebudde

Advocate-on-Record

Supreme Court of India

M: 9899474399

Copy to:

The Hon'ble National Green Tribunal

Southern Zone, Chennai

Email: judicial-ngtsh@gov.in**REJOINDER- FINAL.pdf**

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