

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONAL BENCH AT CHENNAI**

**O.A No. 53 of 2025**

IN THE MATTER OF

1. G. MOHANA PRIYA,  
D/o. Gopinath,  
Aged about 29 years,  
N-4, Bajanai Koil Street,  
Gurupatham Nagar,  
Varadharajapuram,  
Kancheepuram, Tamil Nadu- 600044
2. A.R. RATHNAKUMAR  
S/o. Rathnasabapathy  
Aged about 66 years,  
N-9, Moogambigai Nagar,  
Varadharajapuram,  
Kancheepuram, Tamil Nadu- 600044
3. RAYYAPAN VEERARAGHAVAN  
S/o. Veeraraghavan,  
N-3/30, Christhu Raja Kovil Street,  
Erumaiyur, Tirumudivakkam,  
Sriperumbudur, Kancheepuram,  
Tamil Nadu – 600044
4. JOSE PUNNOOSE  
S/o. M.C. Punnoose,  
N-82, Navodaya, Varadharajapuram,  
Kancheepuram, Tamil Nadu – 600044.

...Applicants

Versus

1. WATER RESOURCE DEPARTMENT,  
Public Welfare Department, Government of Tamil Nadu,  
Through the Chief Engineer,  
PWD Estate,  
Chepauk, Chennai-600 005.  
[eicwrdsn@gmail.com](mailto:eicwrdsn@gmail.com), 044-28410402.
2. TAMIL NADU POLLUTION CONTROL BOARD,  
Through the Chairman,

76, Mount Salai, Guindy, Chennai - 600 032  
Tel: 044-22353134-139  
Email-ID: [tnpcb-chn@gov.in](mailto:tnpcb-chn@gov.in)

3. THE DISTRICT COLLECTOR, KANCHEEPURAM DISTRICT  
First Floor,  
Collectorate,  
Kancheepuram - 631501  
Phone: +91-044-27238433,  
Email: [collrkpm@nic.in](mailto:collrkpm@nic.in).
4. TAMIL NADU STATE ENVIRONMENT IMPACT ASSESSMENT  
AUTHORITY (SEIAA),  
Through the Chairman  
Ground Floor, Panagal Maligai, No.1 Jeenis Road,  
Saidapet,  
Chennai-600015  
Tamil Nadu
5. Chennai Metropolitan Development Authority  
Through Member Secretary,  
Thalamuthu – Natarajan Maaligai  
No.1, Gandhi Irwin Road  
Egmore  
Chennai- 600008.  
044-28414855, [msmcda@tn.gov.in](mailto:msmcda@tn.gov.in)
6. Kishkinta Land Developers Pvt Ltd  
Through the Director,  
Manek Mahal,  
6<sup>th</sup> Floor, 90 Veer Nariman Road,  
Mumbai, Maharashtra- 400020.
7. Urban Rise (OPUS 96)  
Through the Managing Partner,  
Plot No. A, No. 36/1, Gandhi Mandapam Rd,  
Kotturpuram, Chennai – 600085
8. Alliance Infrastructure Projects Pvt Ltd  
Through the Managing Director,  
Plot No. 'A, No. 36/1, Gandhi Mandapam Rd,  
Chitra Nagar, Kotturpuram,  
Chennai- 600085

...RESPONDENTS

**ADOPTION MEMO FILED ON BEHALF OF RESPONDENT NO. 6**

1. It is respectfully submitted that the instant application has been filed alleging encroachment of water canals at Survey numbers 340/1, 415 to 421, 444 to 446, 464, 465, 466, 467, 468, 469, 470, 472, 473, 474, 475, 480 (all parts), 481/2 of Varadharajapuram Village, Kundrathur Taluk, Kancheepuram District, by Respondents No. 6 & 7 for the establishment of alleged Integrated Town Ship comprising 900 luxury Plots and 3200 residential units under the name OPUS 96. It is respectfully submitted that all the allegations mentioned therein are denied as false, frivolous and motivated and the application is liable to be dismissed.
  
2. It is respectfully submitted that in the instant application, the Respondent No. 8 has filed a counter affidavit with annexure. For the sake of brevity and convenience, the said counter and annexures are adopted by the Respondent No. 6 herein as their objections and documents submitted to the instant appeal. The Respondent No. 6 reserve their right to file an additional counter during the course of this appeal.

In light of the above, it is prayed that this Hon'ble Tribunal may be pleased to take this memo on record and pass further order/s as this Hon'ble Tribunal may deem necessary in the circumstances of the case and thus render justice.

Dated at Chennai on this the 10<sup>th</sup> day of April, 2026.



**COUNSEL FOR RESPONDENT No. 6-8**

**BEFORE THE HON'BLE  
NATIONAL GREEN  
TRIBUNAL SOUTHERN  
ZONAL BENCH AT  
CHENNAI**

**O.A. No. 53 of 2025**

G. MOHANA PRIYA

And 3 ors.

...Applicants

Vs

WATER RESOURCE  
DEPARTMENT,

And 7 ors.

...Respondents

**ADOPTION MEMO FILED  
ON BEHALF OF  
RESPONDENT NO. 6**

RUKMANI VENUGOPALAN  
(MS 2380/2017)  
**Counsel for Respondent Nos. 6-**

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