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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE: CHENNAI**

REJOINDER IN

ORIGINAL APPLICATION NO. 59 OF 2025

(Under S.14 and S.15 r/w S.18 of National Green Tribunal Act, 2010)

IN THE MATTER OF: -

MANJUNATH HIRECHOWTI

DEEPAK C. N.

...APPLICANTS

VERSUS

GOVERNMENT OF KARNATAKA & ORS.

..RESPONDENTS

**REJOINDER FILED BY THE APPLICANTS TO THE
REPLY OF RESPONDENT NO. 5**

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The Applicants above-named most respectfully submit as follows:

1. That the **REJOINDER** is filed on behalf of the applicants in response to the Reply received from Respondent No. 5. That with the response, the applicants place relevant facts, documents, and contradictions in their arguments. At the outset, Applicants submit that any averment of fact, even if not traversed or specifically dealt with in this response, shall be treated as having been denied unless admitted specifically hereinafter.
2. The Applicants respectfully submit that the present matter involves grave violations of environmental law and principles

recognized under the jurisprudence of the Hon'ble Supreme Court, including the **Public Trust Doctrine**, **Precautionary Principle**, and **Polluter Pays Principle**, which are now integral to Indian environmental governance. The Respondents, being instrumentalities of the State, are duty-bound to protect natural resources, particularly riverine ecosystems, and cannot abdicate this responsibility by undertaking unauthorized constructions.

3. Rebuttal regarding KNNL's Mandate and Violation of Government Notifications (WRD 129 KBN 2020):

The Respondent No. 5, in Paragraph 2, 14 of the Reply, asserts that as a wholly-owned Government of Karnataka company, it is responsible for the "planning, investigation, estimation, execution, operation, and maintenance of all irrigation projects." By its own admission, the Respondent's primary mandate is "irrigation projects". The construction of a decorative "Pushkarni" (religious bathing tank) and a retaining wall for a private religious institution does not constitute an "irrigation project" nor does it serve any "Command Area Development" purpose. This is a clear deviation from the object's clause of its Memorandum and Articles of Association. Furthermore, the Applicants place heavy reliance on the **Notification No. WRD 129 KBN 2020** dated 28/08/2020 issued by the Additional Chief Secretary, Water Resources Department (**Annexure-R1**). This notification explicitly directs all four state irrigation corporations to strictly adhere to the Objects Clause in their Memorandum and

Articles of Association which highlights that the primary objectives of these corporations are irrigation projects and it should not propose or approve anything other than those mentioned in its Objects Clause. It further warns that any deviation from these objects will result in the concerned officer being held personally responsible. The applicants humbly submit that this construction is for the benefit of a private Mutt's religious processions and not for any public irrigation or conservation purpose as falsely claimed.

4. It is humbly submitted that in Paragraph 4 of the Reply, the Respondent admits that the retaining wall was constructed on the land of the Ramachandrapura Mutt. The Applicants submit two distinct and clear challenges to the Respondent's assertions
(i) The Respondent No. 5 has failed to submit any documentary evidence, such as Survey Records or RTCs, to prove that the construction took place on the private land of the Ramachandrapura Mutt. The Respondent relies on a vague claim of "Mutt land" to justify its actions, yet the official survey maps and RTCs publicly available via the state-owned **Bhoomi portal (Annexure-R2 R3 R4 R5)** do not support this assertion of private ownership over the construction site.

ii) Even if the Respondent's assertion of private land were true—which is expressly denied—the act of a state-owned corporation like KNNL using public funds to construct private religious infrastructure is a **gross violation of its Memorandum of Association (MoA) and the Public Trust Doctrine**. KNNL's mandate is strictly limited to public irrigation and water projects; it has no legal authority to act as

a private contractor for religious institutions or to divert public funds for the benefit of a private Mutt.

5. It is humbly submitted that in Paragraph 5, the Respondent claims no temple renovation took place, yet their own Annexure R-1 (Satellite Images) shows active renovation and construction before and after the works. Furthermore, It is respectfully submitted that the Respondent's contention that the "Pushkarni" facilitates water harvesting is not supported by established hydrological principles. A permanently lined masonry structure constructed using stone and granite significantly reduces natural percolation and groundwater recharge. The construction of the riverfront and Pushkarni, while intended to protect the temple and support ritual purposes, has altered the natural flow regime of the tributaries and modified the floodplain. This change in hydrology and riparian conditions warrants an independent expert evaluation to assess ecological impacts.
6. It is humbly submitted that, The Respondent contends in Paragraphs 8, 9, 15, 17 and 19 that the work was executed based on "prior administrative approvals" and was executed to "preserve the settlement" and to "protect flora and fauna." The Applicants strongly dispute this and submit that a concrete retaining wall inherently fragments the riparian ecosystem and destroys the very habitat it claims to preserve. Crucially, the Respondent's argument that a tender exemption under the KTPP Act or a financial sanction from the Finance Department bypasses the need for environmental clearances is legally flawed and untenable. A procurement or financial exemption

cannot—and does not—supersede the Environment Protection Act, 1986, the Biological Diversity Act, 2002, or the Water (Prevention and Control of Pollution) Act, 1974. Administrative convenience for a private settlement cannot override the Public Trust Doctrine or the legal necessity of an Environmental Impact Assessment (EIA). By their own admission, the Respondent confirms that no Consent for Establishment and no Environmental Clearance (EC) was ever obtained, rendering the entire project an illegal exercise of power. Regardless of administrative rules, no entity has the right to alter the morphology of a riverbed without mandatory environmental clearances. It is further submitted that the requirement of prior Environmental Clearance and statutory consents is **mandatory in nature** and cannot be bypassed through administrative approvals or financial sanctions. This position has been consistently upheld by judicial precedents, including **M.C. Mehta v. Kamal Nath**, wherein the Hon'ble Supreme Court emphasized the State's obligation to protect natural resources held in public trust. This position is further reinforced in **Intellectuals Forum v. State of Andhra Pradesh**, wherein the Hon'ble Supreme Court held that water bodies and ecological lands cannot be diverted for non-essential or private purposes.

7. It is humbly submitted that the Respondent No. 5 claims in Paragraph 10, that the lands used for the construction of the retaining wall are "private lands" and were "acquired" from private landowners with their "due consent." The Applicants submit that these assertions are completely unsubstantiated and

misleading. Despite making such a claim, the Respondent has failed to produce a single title deed, land ownership record, or survey document to prove the private status of the land. The Respondent's claim of "consensual acquisition" is contrary to the mandatory statutory framework under the **Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013**, which prescribes a detailed procedure including notification, social impact assessment, compensation determination, and rehabilitation measures. Any deviation from this statutory procedure renders the alleged acquisition void ab initio and legally unsustainable.

It is further submitted that the failure of a government corporation to provide even a single piece of evidence regarding the initiation of acquisition proceedings or the payment of compensation indicates that the claim of "private land" appears to be an unsubstantiated assertion and raises serious doubt regarding the true nature of the land.

8. It is humbly submitted that the Applicants place heavy reliance on the satellite imagery obtained from the state owned Bhoomi portal (**Annexure-R2**), which demonstrates that the river flows directly over the constructed area and the construction site is situated within a highly sensitive riparian ecosystem between Survey No. 82 (South) and Survey No. 76 (North) which is the forest land and appears as a distinct **White Polygon** in the satellite image. As per the official RTC Data (**Annexure-R3**), **Survey No. 76** comprises approximately **42 acres of Forest Land**, 11 acres leased to Karnataka Power Corporation Limited, and 20 guntas of Gomala and 4 acres of private land.

It is submitted that due to land accretion and alluvion, the river's exact boundaries are difficult to gauge through mere administrative observation.

Furthermore, a scrutiny of the southern boundary of Survey No. 82 reveals a highly irregular progression. While Survey No. 82/1 (standing in the name of KPCL, as reflected in **Annexures–R4 and R5**, wherein **Annexure–R4** depicts the white polygon in the satellite imagery and **Annexure–R5** contains the Record of Rights integrating cadastral and ownership data) and Survey No. 82/2 (private land) are pre-existing survey subdivisions, a new hissa bearing Survey No. 82/3 has been subsequently created and mutated in the name of the **Mutt's Swamiji possession via MR No. T10/2023–2024 Public; Semi public Uses dated 14.03.2024** . The timing of the mutation entry raises serious and legitimate concerns regarding its bona fides. The fact that the mutation was effected subsequent to the initiation of proceedings by the Applicants gives rise to a reasonable inference that the same may have been undertaken to retrospectively legitimize the impugned construction. This aspect requires independent verification by a competent authority.

The satellite imagery relied upon by the Applicants has been obtained by entering the relevant land particulars through the official State portal, namely the Bhoomi Maps service hosted at <https://rdservices.karnataka.gov.in/BhoomiMaps/>.

Further, the Record of Rights (RTC) details have been accessed through the Government of Karnataka land records portal at

<https://landrecords.karnataka.gov.in/> by navigating the “RTC Sketch (Beta Version)” module, which subsequently redirects to the service interface link retrieving survey-wise land records. <https://landrecords.karnataka.gov.in/service2/forM16A.aspx>

To ensure the authenticity and evidentiary value of the digital records, including the accessed online RTC and related URLs, a certificate under Section 65B of the Indian Evidence Act, 1872 is annexed herewith as **Annexure–R6**.

9. It is humbly submitted that in Paragraph 13, the Respondent claims the Member of Parliament of Shivamogga, Sri B.Y. Raghavendra issued the request letter only after Finance Department approval dated **11.01.2021**. However, the Respondent admits the MP’s request was dated **15.08.2020**. It is a factually untenable and internally inconsistent for a request made in August 2020 to be based on an approval that did not exist until five months later. This chronological mismatch exposes raises serious doubts regarding the credibility of the Respondent’s version to mislead this Hon’ble Tribunal with a false sequence of events.
10. It is humbly submitted that the Respondent’s contention in Paragraph 20, that Nirmiti Kendra was not a "Public Authority" under the RTI Act until the Hon’ble High Court of Karnataka's judgment on 24.07.2025, is a deliberate attempt to reward institutional non-compliance. A Nirmiti Kendra, by the very nature of its funding, administrative control, and the public works it executes, has always fallen under the definition of a "Public Authority" under Section 2(h) of the RTI Act. The High

Court judgment did not create this status; it merely confirmed it and penalized the Kendra for its illegal stance of denial. The refusal to provide documents regarding the "Pushkarni" sought as early as 04.02.2023 was a strategic move to suppress information on illegal construction and prevent the Applicants from approaching this Hon'ble Tribunal in a timely manner. The Applicants further highlight the Order of the Karnataka Information Commission (KIC/17537/APL/2023) dated 01.12.2025, which specifically ordered the disclosure of these documents. While these procedural violations under the RTI Act are distinct, they are placed before this Tribunal to demonstrate the merits of the Application and the systemic hurdles created by the authorities to shield illegal environmental alterations from judicial scrutiny.

11. It is humbly submitted that the Applicants place heavy reliance on the Technical Guidelines on Flood Plain Zoning issued by the Central Water Commission (CWC). These national guidelines emphasize that floodplains must be kept free from permanent masonry structures to allow for the natural expansion of the river during high-flow seasons. By constructing a permanent "Pushkarni" and a concrete riverfront, the Respondents have directly contravened these national safety and environmental standards.

Furthermore, the Applicants bring to the notice of this Hon'ble Tribunal the recently notified Karnataka Tank Conservation and Development Authority (Amendment) Act, 2025 (Notified on 18/02/2026). This Act reaffirms that even small water bodies require a mandatory "No-Construction Buffer Zone" to

ensure water percolation, flood mitigation, and ecological stability. For instance, the Act mandates a 30-meter buffer for large lakes and varying setbacks for smaller ponds.

The Applicants contend that if a stagnant pond requires a protective buffer, a perennial and life-saving river like the Sharavathi—which supports a far more complex riparian biodiversity—deserves even greater protection. If the State recognizes the need for buffer zones for small tanks to prevent ecological collapse, it is scientifically and legally indefensible to deny similar protections to the Sharavathi River, which is governed by stringent CWC guidelines.

The present issues squarely fall within the jurisdiction of this Hon'ble Tribunal under Sections 14, 15 and 18 of the National Green Tribunal Act, 2010, as they relate to substantial questions concerning the environment and ecological damage.

The damage caused to the riverine ecosystem is not merely regulatory in nature but has the potential to result in irreversible ecological consequences if not immediately addressed. In the absence of any statutory clearances, lawful land acquisition, or ecological safeguards, the impugned construction is *ex facie* illegal and liable to be removed in order to restore the rule of law and environmental balance.

In view of the above-stated facts and the significant contradictions in the version provided by Respondent No. 5 (KNNL), the Applicants reiterate that the impugned construction is illegal and squarely outside the Respondent's

legal mandate. The Applicants, therefore, pray that the submissions made in the Original Application be allowed in the interest of justice and environmental protection.

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..RESPONDENTS

AFFIDAVIT

We both, Manjunath Hirechowti aged 42 years, S/o S Hucharayappa, 208, Dr. Rajkumar Road, Prakash Nagar, Bengaluru – 560021,

AND

Deepak C.N. aged 46 years S/o C.M. Nagaraju, r/o 174, 15th main, Dwarakawasa Road, 2nd stage, Bharatnagara, Bengaluru 560 091 do hereby solemnly declare and affirm that:

1. That we are the Applicants in the above-numbered Original Application and are fully conversant with the facts and circumstances of the case. As such, we are competent to swear this affidavit in support of the accompanying Rejoinder filed in response to the reply of Respondent No. 5.
2. That we have read the contents of the accompanying Rejoinder, including the factual submissions, legal arguments, and the prayers.
3. We jointly state that the contents of the Rejoinder are true and correct to the best of our knowledge, information, and belief. No part of it is false and nothing material has been concealed therefrom.

DEPONENT 1 Manjunath Hirechowti (Manjunath Hirechowti)

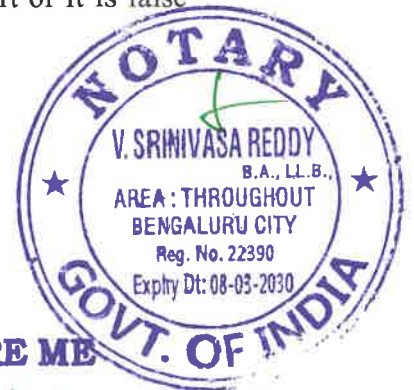
DEPONENT 2 Deepak C.N. (Deepak C.N.)

SWORN TO BEFORE ME

V. SRINIVASA REDDY
B.A., LL.B.

ADVOCATE & NOTARY
GOVT. OF INDIA

No.26/3, Rathna Vilas Road,
Basavanagudi, Bengaluru-560024



24 MAR 2026

VERIFICATION

Verified at Bengaluru on this the 24th day of March, 2026, that the contents of above affidavit are true and correct to the best of our knowledge and belief, no part of it is false and nothing has been concealed therefrom.



DEPONENTS



SWORN TO BEFORE ME
Boddy 24/3/2026
V. SRINIVASA REDDY
B.A., LL.B.
ADVOCATE & NOTARY
GOVT. OF INDIA
No.26/3, Rathna Vilas Road,
Basavanagudi, Bengaluru-560004
24 MAR 2026

NOTARY REGISTRATION No. 22390
Book No. 1 Page No. 14
Date. 24/3/2026 Sl. No. 50

Annexure-R1



ಕರ್ನಾಟಕ ಸರ್ಕಾರ

ಸಂಖ್ಯೆ:ಜಸಂಇ 129 ಕೆಬಿಎನ್ 2020

ಕರ್ನಾಟಕ ಸರ್ಕಾರದ ಸಚಿವಾಲಯ

ವಿಕಾಸ ಸೌಧ

ಬೆಂಗಳೂರು, ದಿನಾಂಕ:28/ 08/2020

:: ಸುತ್ತೋಲೆ ::

ವಿಷಯ : ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆಯಡಿ ಕಾರ್ಯ ನಿರ್ವಹಿಸುತ್ತಿರುವ ನಿಗಮಗಳ Memorandum and Articles of Association ರಲ್ಲಿಯ ಉದ್ದೇಶಗಳನ್ನು ಸಮರ್ಪಕವಾಗಿ ಅನುಷ್ಠಾನ ಗೊಳಿಸುವ ಕುರಿತು.

ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆಯಡಿ (1) ಕೃಷ್ಣಾ ಭಾಗ್ಯ ಜಲ ನಿಗಮ ನಿಯಮಿತ (2) ಕರ್ನಾಟಕ ನೀರಾವರಿ ನಿಗಮ ನಿಯಮಿತ, (3) ಕಾವೇರಿ ನೀರಾವರಿ ನಿಗಮ ನಿಯಮಿತ ಮತ್ತು (4) ವಿಶ್ವೇಶ್ವರಯ್ಯ ಜಲ ನಿಗಮ ನಿಯಮಿತ ಗಳನ್ನು ಕಂಪನಿ ಕಾಯ್ದೆ ಅಡಿ ನೋಂದಾಯಿಸಲ್ಪಟ್ಟು ಕಾರ್ಯ ನಿರ್ವಹಿಸುತ್ತಿರುತ್ತವೆ.

ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ ಅಡಿಯ ನಾಲ್ಕೂ ನಿಗಮಗಳು Memorandum and Articles of Association ನ Objects clause ಹೊಂದಿರುತ್ತವೆ. ಇದರಡಿ ಪ್ರಮುಖವಾಗಿ ಸರ್ಕಾರದ ಆಡಳಿತಾತ್ಮಕ ಅನುಮೋದನೆಯೊಂದಿಗೆ ನೀರಾವರಿ ಯೋಜನೆಗಳ ಅನುಷ್ಠಾನ, ಯೋಜನೆಗಳಿಗೆ ಸಂಬಂಧಿಸಿದ ಭೂಸ್ವಾಧೀನ, ಪುನರ್ ವಸತಿ ಮತ್ತು ಪುನರ್ ನಿರ್ಮಾಣ ಹಾಗೂ ಯೋಜನೆಗಳ ಕಾರ್ಯಾಚರಣೆ ಮತ್ತು ನಿರ್ವಹಣೆ ಇತ್ಯಾದಿ ಉದ್ದೇಶಗಳನ್ನು ನಿಗದಿಪಡಿಸಲಾಗಿರುತ್ತದೆ.

ನಿಗಮಗಳ Memorandum and Articles of Association ನಲ್ಲಿ ಉದ್ದೇಶಿಸಿರುವ ಯೋಜನೆ ಮತ್ತು ಕಾಮಗಾರಿಗಳ ಹೊರತುಪಡಿಸಿ ಇನ್ನಿತರೆ ಯಾವುದೇ ಕಾಮಗಾರಿ ಅಥವಾ ಚಟುವಟಿಕೆಗಳನ್ನು ಕೈಗೆತ್ತಿಕೊಳ್ಳುವುದು ಕಂಪನಿ ಕಾಯ್ದೆ ಅಡಿ ಅವಕಾಶವಿರುವುದಿಲ್ಲ. ಆದರೆ ನಿಗಮಗಳಡಿ ಸಲ್ಲಿಸಲಾಗುತ್ತಿರುವ ಪ್ರಸ್ತಾವನೆಗಳು ನಿಗಮದ ಮೂಲ ಉದ್ದೇಶಕ್ಕೆ ವ್ಯತಿರಿಕ್ತವಾಗಿ ಸಲ್ಲಿಸಲಾಗುತ್ತಿರುವುದನ್ನು ಗಮನಿಸಲಾಗಿದೆ. ಇಂತಹ ಪ್ರಸ್ತಾವನೆಗಳ ಪರಿಗಣಿಸುವಿಕೆಯು ನಿಗಮಗಳನ್ನು ಸ್ಥಾಪಿಸಿರುವ ಸರ್ಕಾರದ ಧೈಯ ಮತ್ತು ಉದ್ದೇಶಗಳಿಗೆ ವ್ಯತಿರಿಕ್ತವಾಗಿರುತ್ತದೆ.

ಮೇಲ್ಕಂಡ ಅಂಶಗಳ ಹಿನ್ನೆರೆಯಲ್ಲಿ, ನಿಗಮಗಳು ಯಾವುದೇ ಯೋಜನಾ ಕಾಮಗಾರಿಗಳಿಗೆ ಮತ್ತು Memorandum and Articles of Association ನ Objects clause ನಲ್ಲಿ ಉದ್ದೇಶಿಸದೇ ಇರುವ ಕಾಮಗಾರಿಗಳನ್ನು ಪ್ರಸ್ತಾಪಿಸಬಾರದು.



ನಿಗಮಗಳ ನಿರ್ದೇಶಕರ ಮಂಡಳಿ ಹಾಗೂ ಇತರ ಸಕ್ಷಮ ಪ್ರಾಧಿಕಾರಗಳಿಗೆ ಪ್ರಸ್ತಾವನೆಗಳನ್ನು ಸಲ್ಲಿಸುವ ಮುನ್ನ ನಿಗಮಗಳ Memorandum and Articles of Association ನ Objects clause ನಲ್ಲಿ ಅಳವಡಿಸಿಕೊಂಡ ಕಂಪನಿ ಕಾಯ್ದೆ ಅನ್ವಯ ಯೋಜನೆಗಳನ್ನು ಪರಿಶೀಲಿಸಿ ಕಡ್ಡಾಯವಾಗಿ ಖಚಿತಪಡಿಸಿಕೊಳ್ಳಲು ಸೂಚಿಸಲಾಗಿದೆ. ಇನ್ನು ಮುಂದೆ ನಿಗಮಗಳಲ್ಲಿ ಕಂಪನಿ ಕಾಯ್ದೆಗಳನ್ನು ಉಲ್ಲಂಘಿಸಿ ಕಾಮಗಾರಿಗಳನ್ನು ಪ್ರಸ್ತಾಪಿಸಿದಲ್ಲಿ / ಕೈಗೊಂಡಿದ್ದಲ್ಲಿ ಸಂಬಂಧಪಟ್ಟ ಅಧಿಕಾರಿಗಳನ್ನು ನೇರ ಹೊಣೆಗಾರರನ್ನಾಗಿ ಮಾಡಲಾಗುವುದು.

(Handwritten Signature)
29-08-20

(ರಾಕೇಶ್ ಸಿಂಗ್)

ಸರ್ಕಾರದ ಆಪರ ಮುಖ್ಯ ಕಾರ್ಯದರ್ಶಿ,
ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ.

ಪ್ರತಿಯನ್ನು ಮಾಹಿತಿಗಾಗಿ ಮತ್ತು ಮುಂದಿನ ಕ್ರಮಕ್ಕಾಗಿ:

1. ವ್ಯವಸ್ಥಾಪಕ ನಿರ್ದೇಶಕರು, ಕೃಷಾ ಭಾಗ್ಯ ಜಲ ನಿಗಮ ನಿಯಮಿತ, ಬೆಂಗಳೂರು.
2. ವ್ಯವಸ್ಥಾಪಕ ನಿರ್ದೇಶಕರು, ಕರ್ನಾಟಕ ನೀರಾವರಿ ನಿಗಮ ನಿಯಮಿತ, ಬೆಂಗಳೂರು.
3. ವ್ಯವಸ್ಥಾಪಕ ನಿರ್ದೇಶಕರು, ಕಾವೇರಿ ನೀರಾವರಿ ನಿಗಮ ನಿಯಮಿತ, ಬೆಂಗಳೂರು.
4. ವ್ಯವಸ್ಥಾಪಕ ನಿರ್ದೇಶಕರು, ವಿಶ್ವೇಶ್ವರಯ್ಯ ಜಲ ನಿಗಮ ನಿಯಮಿತ, ಬೆಂಗಳೂರು.

ಪ್ರತಿಯನ್ನು ಮಾಹಿತಿಗಾಗಿ:

1. ಮಾನ್ಯ ಜಲ ಸಂಪನ್ಮೂಲ ಸಚಿವರ ವಿಶೇಷ ಕರ್ತವ್ಯಾಧಿಕಾರಿಗಳು, ವಿಧಾನ ಸೌಧ, ಬೆಂಗಳೂರು.
2. ಮಾನ್ಯ ಜಲ ಸಂಪನ್ಮೂಲ ಸಚಿವರ ಆಪ್ತ ಕಾರ್ಯದರ್ಶಿಗಳು, ವಿಧಾನ ಸೌಧ, ಬೆಂಗಳೂರು.
3. ಸರ್ಕಾರದ ಆಪರ ಮುಖ್ಯ ಕಾರ್ಯದರ್ಶಿಗಳು, ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ ಇವರ ಆಪ್ತ ಕಾರ್ಯದರ್ಶಿಗಳು.
4. ಸರ್ಕಾರದ ಕಾರ್ಯದರ್ಶಿಗಳು, ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ ಇವರ ಆಪ್ತ ಕಾರ್ಯದರ್ಶಿಗಳು.
5. ಸರ್ಕಾರದ ಹೆಚ್ಚುವರಿ ಕಾರ್ಯದರ್ಶಿಗಳು, ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ ಇವರ ಆಪ್ತ ಸಹಾಯಕರು.
6. ಸರ್ಕಾರದ ಉಪ ಕಾರ್ಯದರ್ಶಿಗಳು (ಕೃಷಾಜನಿ), ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ ಇವರ ಆಪ್ತ ಸಹಾಯಕರು.
7. ವಿಶೇಷ ಕರ್ತವ್ಯಾಧಿಕಾರಿಗಳು, (ತಾಂತ್ರಿಕ-3)/(ತಾಂತ್ರಿಕ-4) ಜಲ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ.
8. ಸರ್ಕಾರದ ಅಧೀನ ಕಾರ್ಯದರ್ಶಿಗಳು, (ತಾಂತ್ರಿಕ-1)/(ತಾಂತ್ರಿಕ-2), ಜ.ಸಂ. ಇಲಾಖೆ.
9. ತಾಂತ್ರಿಕ ಸಹಾಯಕರು (ತಾಂತ್ರಿಕ-6)/(ತಾಂತ್ರಿಕ-7) ಜ.ಸಂ ಇಲಾಖೆ.
10. ಶಾಖಾ ರಕ್ಷಕ ಕಡತ / ಹೆಚ್ಚುವರಿ ಪ್ರತಿಗಳು.



ATTESTED TRUE COPY

(Handwritten Signature)
V. SRINIVASA REDDY
B.A., LL.B.
ADVOCATE & NOTARY
GOVT. OF INDIA
No.26/3, Rathna Vilas Road,
Basavanagudi, Bengaluru-560004

Translation for Annexure-R1

Government of Karnataka

No: WRD 129 KBN 2020

Karnataka Government Secretariat
Vikasa Soudha
Bengaluru, Date: 28/08/2020

:: CIRCULAR ::

Subject: Regarding the effective implementation of the objectives of the **Memorandum and Articles of Association** for corporations functioning under the Water Resources Department.

The following four corporations are registered and functioning under the Companies Act within the Water Resources Department: (1) Krishna Bhagya Jala Nigam Limited, (2) Karnataka Neeravari Nigam Limited, (3) Cauvery Neeravari Nigam Limited, and (4) Visvesvaraya Jala Nigam Limited.

All four corporations under the Water Resources Department possess an "Objects Clause" in their Memorandum and Articles of Association. Under this clause, the primary objectives set forth are the implementation of irrigation projects with the administrative approval of the Government, land acquisition related to projects, Rehabilitation and Resettlement (R&R), and the operation and maintenance of projects, etc.

Under the Companies Act, there is no provision for these corporations to undertake any works or activities other than the projects and works intended in their Memorandum and Articles of Association. However, it has been observed that proposals are being submitted under these corporations that are contrary to their original objectives. The consideration of such proposals is contrary to the aims and objectives of the Government in establishing these corporations.

In light of the above points, the corporations shall not propose any works that are not intended in the "Objects Clause" of their Memorandum and Articles of Association.

It is directed that before submitting proposals to the Board of Directors of the corporations and other competent authorities, officials must verify and strictly ensure that the projects align with the "Objects Clause" adopted in the Memorandum and Articles of Association as per the Companies Act. Henceforth, if any works are proposed or undertaken in the corporations in violation of the Companies Act, the concerned officers will be held directly responsible.

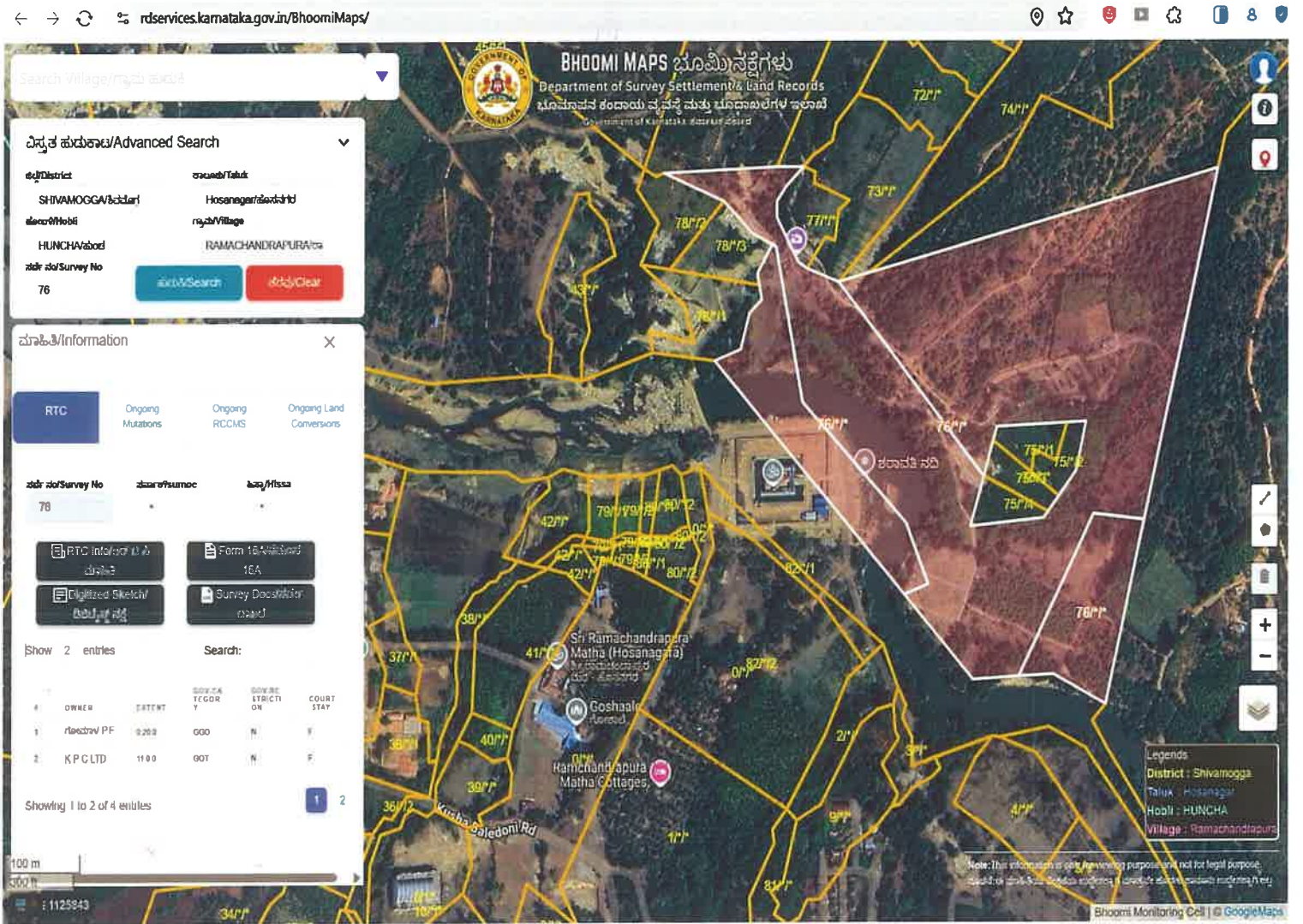
Signed, (Rakesh Singh)
Additional Chief Secretary to Government,
Water Resources Department

Distribution for Information and Action:

- Managing Directors of KBJNL, KNNL, CNNL, and VJNL.
- Special Officer and Private Secretary to the Honorable Minister for Water Resources.
- Secretariat staff and technical assistants within the Water Resources Department.

*Manjula H
Translated by myself*

Annexure-R2



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 Basavanagudi, Bengaluru-560004

Annexure-R3

landrecords.karnataka.gov.in/service2/form16A.aspx



Bhoomi Online | Land Records | View

Records of Rights, Tenancy & Crops (RTC) Form 16 | Mutation Register | Mutation Status

English

Current Year MR Mutation Status Khata Extract Survey Document Akarband **RTC SKETCH (Beta)**

https://rtc.karnataka.gov.in/ You can get the original digitally signed RTC and MR at rtc.karnataka.gov.in

RTC SKETCH DETAILS

District	Taluk	Hobli	Village	Survey Number	Go
SHIVAMOGGA	Hosanagar	HUNCHA	RAMACHANDRAPURA	76	
Sumoc	Hissa	Fetch Details			

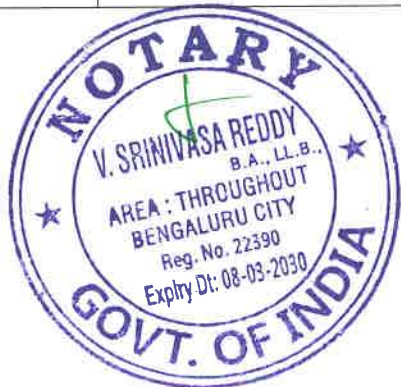
Owner Details	OnGoing Mutation : No	PYKI : No	Details				
Owner	Extent	Owner Category	Gov Restriction	Court stay	Alienated	Village :	Survey Number : 76
ಗೋಮಾಳ P.F	0.20.0	Govt	No	No	No	RAMACHANDRAPURA	
K P C LTD	11.0.0	Govt	No	No	No	Hissa : *	
ಅರಣ್ಯ	42.0.0	Govt	No	No	No	Year : 2025-2026	
M.S. ಶಂಕರನಾರಾಯಣ ಬಿನ್ ಸುಬ್ರಾವ್	4.0.0	Private	Yes	No	No		

Disclaimer: The information available on website is updated in all respect. Users may access the updated RTC details through online mode without any further requirement of visiting the department.

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Designed and Hosted by: BHUGAL MONITORING CELL.

English Translation / Abstract of Particulars:

Field(Kannada)	Details in English	Extent	Owner Category
ಗೋಮಾಳ P.F	Gomala	0.20.0	Govt
KPC LTD	KPC LTD	11.0.0	Govt
ಅರಣ್ಯ	Forest	42.0.0	Govt
M S ಶಂಕರನಾರಾಯಣ ಬಿನ್ ಸುಬ್ರಾವ್	M S Shankaranarayana bin Subrav	4.0.0	Private



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 Basavanagudi, Bengaluru-560004

Annexure-R4

BHOOMI-MAPS ಭೂಮಿ ನಕ್ಷೆಗಳು
 Department of Survey Settlement & Land Records
 ಭೂಮಿ ನಕ್ಷೆ, ಕರಾರು, ವಸತಿ ಮತ್ತು ಭೂಮಿ ಸಂಪನ್ಮೂಲ ಇಲಾಖೆ
 Government of Karnataka, Government of Karnataka

Search Village/ಗ್ರಾಮ ಹುಡುಕಿ

ದಿವ್ಯತ ಹುಡುಕಾಟ/Advanced Search

ಜಿಲ್ಲೆ/District: SHIVAMOGGA/ಹಿವಮೊಗ್ಗ
 ತಾಲ್ಲೂಕು/Taluk: Hosanagara/ಹೊಸನಗರ
 ಹಿಲ್ಲೆ/Hobli: HUNCHA/ಹಂಚಿ
 ಗ್ರಾಮ/Village: RAMACHANDRAPURAO

ಸರ್ವೆ ನಂ./Survey No: 82

ಮಾಹಿತಿ/Information

RTC | Ongoing Mutations | Ongoing RCO/S | Ongoing Land Conversions

ಸರ್ವೆ ನಂ./Survey No: 82 | ಸರ್ಕಾರಿ/sumoc: | ಹಿಲ್ಲೆ/missa: 1

Form 10A (ಕರಾರು) 10A | Survey Docs/ನಕ್ಷೆ ದಾಖಲೆ

Showing 1 to 1 of 1 entries

Legends: District : Shivamogga, Taluk : Hosanagara, Hobli : HUNCHA, Village : Ramachandrapura



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 Basavanagudi, Bengaluru-560004

Annexure-R5

ಕರಡು ರೆಕಾರ್ಡ್ ಅಥವಾ ರೈಟ್ಸ್, ಗಣಿಯೊಂದಿಗೆ ಪಹಣಿ (RTC)																															
<table border="1"> <tr> <td>ಜಿಲ್ಲೆ :</td> <td>ಶಿವಮೊಗ್ಗ</td> </tr> <tr> <td>ತಾಲೂಕು :</td> <td>ಹೊಸನಗರ</td> </tr> <tr> <td>ಹೊಬ್ಬಳಿ :</td> <td>ಹುಂಚಿ</td> </tr> <tr> <td>ಗ್ರಾಮ :</td> <td>ರಾಮಚಂದ್ರಾಪುರ</td> </tr> </table>	ಜಿಲ್ಲೆ :	ಶಿವಮೊಗ್ಗ	ತಾಲೂಕು :	ಹೊಸನಗರ	ಹೊಬ್ಬಳಿ :	ಹುಂಚಿ	ಗ್ರಾಮ :	ರಾಮಚಂದ್ರಾಪುರ			<table border="1"> <tr> <td>1.(ಎ) ಸರ್ವೆ ನಂಬರ್ :</td> <td>82</td> </tr> <tr> <td>(ಬಿ) ಸರ್ ನೋಟ್ :</td> <td>*</td> </tr> <tr> <td>2. ಹಿಸ್ಸಾ</td> <td>1</td> </tr> <tr> <td>ಯು.ಎಲ್.ಡಿ.ಎ.ಐ.ಎನ್ :</td> <td>75RA8ND82DYDHO</td> </tr> </table>	1.(ಎ) ಸರ್ವೆ ನಂಬರ್ :	82	(ಬಿ) ಸರ್ ನೋಟ್ :	*	2. ಹಿಸ್ಸಾ	1	ಯು.ಎಲ್.ಡಿ.ಎ.ಐ.ಎನ್ :	75RA8ND82DYDHO												
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ಹೊಬ್ಬಳಿ :	ಹುಂಚಿ																														
ಗ್ರಾಮ :	ರಾಮಚಂದ್ರಾಪುರ																														
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(ಬಿ) ಸರ್ ನೋಟ್ :	*																														
2. ಹಿಸ್ಸಾ	1																														
ಯು.ಎಲ್.ಡಿ.ಎ.ಐ.ಎನ್ :	75RA8ND82DYDHO																														
<table border="1"> <tr> <td>3. ಅಕಾರಬಂದಿನಂತೆ ವಿಸ್ತೀರ್ಣ (ಎ-ಗುಂ)</td> <td>4. ಭೂ ಲಂಠಾಯ (ರೂ.ಪೈ)</td> <td>5. ಮಧ್ಯನ ಛದಕ</td> <td>7. ಮರಗಲ ಹೆಸರು & ಸಂಖ್ಯೆ</td> <td>8. ನೀರಾವರಿ</td> </tr> <tr> <td>(i) ಒಟ್ಟು ವಿಸ್ತೀರ್ಣ=1.15.00.00</td> <td>(i) ಒಟ್ಟು=0.28</td> <td>ಕ.ಮ.ಮಿತ್ರ</td> <td></td> <td>(i) ಮೂಲ</td> </tr> <tr> <td>(ii) ಫೂಲ್ ಬರಾಂಡ್ (ಎ)=0.00.00.00</td> <td>(ii) ಜೂಡಿ=0.00</td> <td>6. ಪುಸ್ತಕ/ಕಾನಾನ್/ಸರ್ಕಾರಿ</td> <td></td> <td>(ii) ಕಾಲಗಳ</td> </tr> <tr> <td>(iii) ಫೂಲ್ ಬರಾಂಡ್ (ಬಿ)=0.00.00.00</td> <td>(iii) ವಸ್ತುಗಳು=0.00</td> <td>ಕಲ್ಯಾ</td> <td></td> <td>ಸಂಖ್ಯೆ</td> </tr> <tr> <td>(iv) ನಿಕ್ಷಲ ಜಾಗು =1.15.00.00</td> <td>(iv) ನೀರಾವರಿ ದರ=0.00</td> <td></td> <td></td> <td>ಹರಾ</td> </tr> </table>	3. ಅಕಾರಬಂದಿನಂತೆ ವಿಸ್ತೀರ್ಣ (ಎ-ಗುಂ)	4. ಭೂ ಲಂಠಾಯ (ರೂ.ಪೈ)	5. ಮಧ್ಯನ ಛದಕ	7. ಮರಗಲ ಹೆಸರು & ಸಂಖ್ಯೆ	8. ನೀರಾವರಿ	(i) ಒಟ್ಟು ವಿಸ್ತೀರ್ಣ=1.15.00.00	(i) ಒಟ್ಟು=0.28	ಕ.ಮ.ಮಿತ್ರ		(i) ಮೂಲ	(ii) ಫೂಲ್ ಬರಾಂಡ್ (ಎ)=0.00.00.00	(ii) ಜೂಡಿ=0.00	6. ಪುಸ್ತಕ/ಕಾನಾನ್/ಸರ್ಕಾರಿ		(ii) ಕಾಲಗಳ	(iii) ಫೂಲ್ ಬರಾಂಡ್ (ಬಿ)=0.00.00.00	(iii) ವಸ್ತುಗಳು=0.00	ಕಲ್ಯಾ		ಸಂಖ್ಯೆ	(iv) ನಿಕ್ಷಲ ಜಾಗು =1.15.00.00	(iv) ನೀರಾವರಿ ದರ=0.00			ಹರಾ	<table border="1"> <tr> <td>1. ಸೃಷ್ಟಿನ ನಕ್ಷೆ (Digitized Sketch)</td> <td>2. ಸೃಷ್ಟಿನ ನೆರ ನೋಟು (OverViewMap)</td> </tr> <tr> <td> </td> <td> </td> </tr> </table>		1. ಸೃಷ್ಟಿನ ನಕ್ಷೆ (Digitized Sketch)	2. ಸೃಷ್ಟಿನ ನೆರ ನೋಟು (OverViewMap)		
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9. ಮಾಲೀಕರ ಅಥವಾ ಕರ್ತೃದಾರರ ಹೆಸರು, ಇಂದ ಹೆಸರಿನೊಂದಿಗೆ	ವಿಸ್ತೀರ್ಣ (ಎ-ಗುಂ)	10. ಮುಕ್ತಾಯದ ಸಂ	11. ಇತರ ಹಕ್ಕು ಮತ್ತು ಮಾರ್ಗಗಳು																												
PKC LTD.	1.15.00.00	23	MR 4/84-85 ----																												

English Translation / Abstract of Particulars:

Field(Kannada)	Details in English
District (ಜಿಲ್ಲೆ)	Shivamogga
Taluk(ತಾಲೂಕು)	Hosanagara
Hobli (ಹೋಬಳಿ)	Huncha
Village (ಗ್ರಾಮ)	Ramachandrapura
Survey No	82
Hissa	1
Total Area (ಒಟ್ಟು ವಿಸ್ತೀರ್ಣ)	1.15.00.00 acre gunta
Owner Name (ಮಾಲೀಕರು)	PKC Ltd



ATTESTED TRUE COPY

V. Srinivasa Reddy

V. SRINIVASA REDDY
B.A., LL.B.
ADVOCATE & NOTARY
GOVT. OF INDIA
No.26/3, Rathna Vilas Road,
Basavanagudi, Bengaluru-560004

Annexure-R6

**CERTIFICATE UNDER SECTION 65B OF THE
INDIAN EVIDENCE ACT, 1872**

(FOR ADMISSIBILITY OF ELECTRONIC RECORDS)

I, **Manjunath Hirechowti**, aged about 42 years, S/o S. Hucharayappa, residing at No. 208, Dr. Rajkumar Road, Prakash Nagar, Bengaluru – 560021, do hereby solemnly affirm and state as follows:

1. I am the Applicant No. 1 in the above-mentioned matter and am fully conversant with the facts of the case.
2. I am the lawful owner/user of the laptop from which the electronic records (screenshots and digital photographs) produced as **Annexures R2, R3, R4, and R5** in the accompanying Rejoinder have been retrieved and printed.
3. I state that the electronic records were created/received by the computer/device in the ordinary course of my activities. During the period over which the said electronic records were created, the computer/device was operating properly, and there have been no distortions that would affect the accuracy of the electronic records or their contents.
4. The prints/output produced herewith as Annexures R2, R3, R4, and R5 are true and correct reproductions of the original electronic records as viewed on the screen of the said device. I have used PrintScreen to capture the whole window and standard print functions to produce these copies.
5. I certify that the information contained in the electronic records is true to the best of my knowledge and that no tampering or alteration has been done to the digital images or the data contained therein.



DEPONENT

(Manjunath Hirechowti)

VERIFICATION

Verified at Bengaluru on this 24th day of March, 2026, that the contents of the above certificate are true and correct to the best of my knowledge and belief.



DEPONENT

(Manjunath Hirechowti)

SWORN TO BEFORE ME

V. SRINIVASA REDDY
B.A., LL.B.

**ADVOCATE & NOTARY
GOVT. OF INDIA**

No.26/3, Rathna Vilas Road,
Basavanaqudi, Bengaluru-560004

