

BEFORE THE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI
O.A. No. 130 of 2024

IN THE MATTER OF:

1. Boddapalli Apparao
S/o Late Boddapalli Neelababy
Aged 56 years, R/O H. No. 4-144,
Thadi Colony, Paravada, Thadi,
Visakhapatnam
Andhra Pradesh - 531019
Mob. No. 9949027286; Mail: NA
2. Komati Suribabu
S/o Late Komati Chinnayya
Aged 68 years, R/o H. No. 3-74
Peda Thadi, Paravada, Thadi,
Visakhapatnam
Andhra Pradesh - 531019
Mob. No. 9949027286; Mail: NA
3. Danoboyano Neelakanta Rao
S/o Late D. Simhachalam, Aged 52 years
R/o H. No. 2-67, Chinna Thadi,
Paravada (MD) Thadi, Visakhapatnam,
Andhra Pradesh - 531019
No. 9949027286; Mail: NA
4. Ganireddy Kanakaraju
S/o Late G. Appalaswami,
Aged 41 years, R/o H. No. 4-84,



Thadi, B.C. Colony, Paravada (M)
Thadi, Visakhapatnam,
Andhra Pradesh - 531019
Mob.: 9949027286; Mail: NA

5. Kuladeep Komati
S/o Late Komati Apparao
Aged 43 years, R/o H. No. 1-91
Chinna Thadi, Paravada (M), Thadi,
Visakhapatnam, Andhra Pradesh - 531 019
Mob. No. 9949027286; Mail: NA

6. Mummina Suri Apparao
S/o China Neela Swamy
Aged 53 years, R/o H. No. 3-104,
Peddha Thadi, Paravada (M) Thadi,
Visakhapatnam, Andhra Pradesh - 531 019
Mob. No. 9949027286; Mail: NA

... Applicants

Versus

1. Union of India
Rep. by its Secretary
Union Ministry of Environment, Forest & CC
Paryavaran Bhavan
New Delhi- 110003
Mail: secy-moef@nic.in
Phone: 011-24695262, 24695265

2. State of Andhra Pradesh
Rep. By its Chief Secretary,
Secretariat, Velagapudi
Guntur District, AP- 522503
Mail: cs@ap.gov.in , Ph: 08632444461



3. Andhra Pradesh Pollution Control Board
Rep. by it's Member Secretary
D.No 33-26-14/D2, Pushpa Hotel Center
Chalamvari Street, Kasturibaipet
Vijayawada, Andhra Pradesh - 520010,
Mail: membersecy@appcb.gov.in. Ph . 08662463202
4. Central Pollution Control Board
Rep. by its Member Secretary
Parivesh Bhawan, CBD- Cum Office Complex
East Arjun Nagar, Delhi - 110032
Mail: mascb@cpcb.nic.in , Phone: 01122307078
5. District Collector
Collector Office, Ankkapalli
Andhra Pradhesh - 531001
Mail: collector-ankp@ap.gov.in
Mobile No. 9490149191
6. Ramky Pharma City
(Now Visakha Pharmacity Limited)
Rep. by its Manager
Admin Block, Commercial Hub JNPC,
Road No 13, Parawada Mandal,
Visakhapatnam, Andhra Pradesh - 531019
Mail : secr@ramky.com, M 08924236001

...Respondents

**REPLY ON BEHALF OF THE RESPONDENT NO. 6, M/S VISAKHA
PHARMACITY LIMITED**

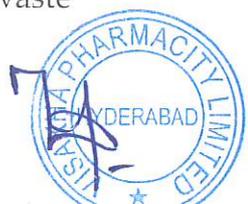
The Respondent No. 6 most humbly submits as follows:



1. The address for service of all notices and process on the Respondent No. 6 is that of their counsel M/s. Arun Karthik Mohan, Suhrith Parthasarathy, Ashwini Vaidialingam, Amritha Sathyajith and Harshvardan R. at No. 7, "Shree Ram Dham", Jagadambal Colony 2nd Street, Royapettah, Chennai - 600 014.
2. At the outset, it is submitted that the captioned Application is riddled with wholly false, concocted and misleading statements and contentions that are, in fact, patently contrary to the records. Accordingly, at the very outset, nothing stated in the captioned Application may be deemed admitted by the Answering Respondent herein, unless such admission is expressly borne out from the contents of the present Reply.

BRIEF BACKGROUND:

3. M/s. Visakha Pharmacy Ltd. (previously known as Ramky Pharmacy (India) Pvt. Ltd.), the 6th Respondent, is a joint venture company set up by the Andhra Pradesh Industrial Infrastructure Corporation, an undertaking of the Government of Andhra Pradesh, and Ramky Infrastructure Ltd. The 6th Respondent was incorporated for the purposes of establishing - on a public-private partnership basis - a "Pharma SEZ" at Parawada Village, Anakapalli District, Andhra Pradesh. This pharma city, which is called the Jawaharlal Nehru Pharma City ("JNPC"), was established by the 6th Respondent in an area of 2143.0 acres of land with facilities encompassing common infrastructure (Roads, Power, Water, Drainage etc.), environment infrastructure (effluent conveyance system, CETP, marine outfall, common hazardous waste



management facility etc.,) and other facilities (solvent recovery facilities, bulk container depots, etc.). JNPC caters to more than 104 industries which include some of the world's leading international pharmaceutical giants including Pfizer (USA), Mylan Laboratories (USA), Eisai Pharma Technology (I) Pvt Ltd (Japan), PharmaZell Pvt Ltd (Germany), SNF (I) Ltd (France partnership) among others.

4. JNPC is widely considered to be India's most successful PPP project in the pharmaceutical sector. In fact, in view of JNPC's success, the Government of India has planned three Bulk Drug Parks in Andhra Pradesh, Himachal Pradesh and Gujarat with aid of Rs. 1000 crores each, with a view to reduce India's dependence on import of raw materials/bulk drugs/intermediates.
5. One of the key features of JNPC is the integrated environmental management system that it offers. Some of the features of this system are as follows:

Waste Management

6. JNPC has established a Common Effluent Treatment Plant (CETP) and a Treatment, Storage, and Disposal Facility (TSDF) for treatment and disposal of waste. These facilities have been set up in accordance with law, and the directions of the APPCB, and are operating in accordance with the requisite Environmental Clearance issued by MOEF and Consent to Operate issued by APPCB.

JNPC has also set up an incinerator with 1.5 TPH capacity for disposal of hazardous waste generated from the industries within and outside the



Pharmacy (including from Srikakulam, Vizianagaram, Visakhapatnam, East Godavari, West Godavari, Krishna and Guntur). The above mentioned waste (which must have calorific value greater than 2500 kcal/kg, biodegradable organics greater than 5% and non-biodegradable organics greater than 20% to qualify for incineration) is first stabilized/solidified and thereafter fed to the incinerator for disposal. Other hazardous waste (which does not have the requisite calorific value) and the waste from the incinerator are sent to a secured landfill facility, after duly following waste stabilisation methods as required. It is submitted that all steps taken by JNPC in respect of the hazardous waste are in accordance with the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016. It may be noted that APPCB regularly inspects and prepares reports on the CETP and the Incinerator. In turn, any and all directions issued by the APPCB to JNPC are duly complied with.

7. JNPC has also established processes for treatment of liquid effluents generated by member industries:

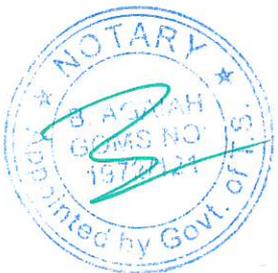
a. Out of the 104 members-units in the Pharmacy, 90 are functional. These 90 member units send their effluents (High TDS and Low TDS effluents) to a CETP with 9.5 MLD capacity, through closed conveyance pipelines, with digital flow metres. The wastewater is duly treated in the CETP, and the treated water complies with all discharge norms/tests laid down by APPCB, including bio-assay tests.

b. After treatment, the wastewater is stored in guard ponds. JNPC has built 10 guard ponds of 5 MLD each (equalling total capacity of 50MLD) for



storing the treated wastewater. A digital flow meter has been installed at the common inlet of all the guard ponds.

- c. If the treated wastewater in the guard ponds is found to conform to the marine discharge standards, the said treated wastewater is discharged into the sea through marine outfall in accordance with the Standard Operating Procedure laid down by the Andhra Pradesh Pollution Control Board. If the treated wastewater does not conform to the marine discharge standards, it is sent back to the CETP for re-treatment till such time it meets the marine discharge standards.
 - d. The marine outfall line was established as per the design approvals provided by the National Institute of Oceanography (NIO), Visakhapatnam and as approved by the Ministry of Environment, Forests & Climate Change. The NIO approval was granted only after studies were carried out on the suitability of the location of disposal of the wastewater in the sea and the potential impact on the Marine Environment, and after duly considering the available dilution and physical, chemical & biological characteristics of the Coastal Environment. The marine outfalls have been provided as per the NIO's design directions, i.e., the depth at which the discharge is to be carried out and the length of the pipeline into sea are as specified by the NIO.
- The marine outfalls are also equipped with Online Continuous Effluent Monitoring Systems, which are connected the APPCB and CPCB websites.

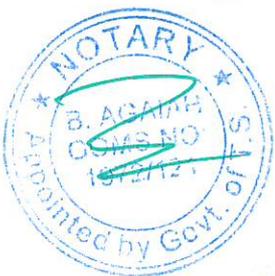


8. As a result of the various waste management and effluent treatment measures, ground water quality in all villages surrounding JNPC are within permissible limits and are being duly monitored by the APPCB.
9. The Andhra University also conducted a study on the impact of the CETP operations on ground water quality for the period between November 2020 and April 2021 within a 10 km radius of the CETP. The study concluded that *“water quality of groundwater is within the permissible limits of drinking water standards. At few places along the coast groundwater quality influenced by salt water intrusion”*.

Redressal of Air Pollution/ Odour Concerns

10. JNPC has taken the following steps to address the air pollution/ odour concerns:

- a. JNPC has set up 3 online Continuous Ambient Air Quality Monitoring (CAAQM) stations at Tadi, Thanam and SEZ Parawada for continuous monitoring of air pollutants as per National Ambient Air Quality Standards. The CAAQM stations are connected to the APPCB's web site and in the event of JNPC exceeding the prescribed limits, auto alerts will be generated and communicated to JNPC for immediate rectification. APPCB also installed a manual ambient air quality station about 500m from Tanam Village. The Ambient Air Quality (AAQ) parameters have been found to be within permissible levels.



- b. The boiler stacks have all been provided with mechanical dust collectors followed by bag filters to control dust/flue gas emissions from the boilers.
- c. All effluent receiving storage tanks are covered with HDPE hoods and provided with a double stage scrubber.
- d. As per the directions of the APPCB, air stripper of MEE has been replaced with a steam stripper.
- e. For the stacks attached to the spray drier of MEE system and the incinerator, a wet scrubber has been provided to control air emissions
- f. In addition, all member industries have provided double stage scrubbers for process vents and have also installed VOC analysers for continuous monitoring of VOCs (Volatile Organic Compounds). These analysers are connected to the APPCB website.

Green Belt:

11. JNPC has developed a green belt as per the layout approved by Vishakhapatnam Urban Development Authority (VUDA) which meets the green belt area requirement within the JNPC. The Andhra University has carried out a study, assessing this green belt set up by JNPC and has found maintenance of good greenery in the area.

Construction of Storm Water Monitoring Ponds:



12. Outside the existing area of 2143 acres allotted for JNPC, the 6th Respondent herein has purchased 55 acres in the land to the south-west of the project i.e., 55 acres comprised in Survey Nos. 165, 166, 167, 168, 169 and 157 (part) adjacent to JNPC. In this privately owned land, the 6th Respondent is constructing storm water monitoring pond in an area of 2 acres. The purpose of the pond is to collect any contaminated storm water runoffs and prevent them from entering any water body outside JNPC. The storm water collected in the pond will be monitored and if they are contaminated, the water will be sent to the CETP for treatment. Further, in order to strengthen the storm water drains in JNPC, a re-enforcement structure to ensure free flow of storm water during rainy season was also being constructed. It is submitted that this is in compliance with the design requirements submitted for obtaining the Environment Clearance and the consent to operate obtained from APPCB. The land on which the storm water drains, and the storm water pond are being constructed does not form part of a green belt area or the buffer zone of the of the Pharma city.

13. It may be noted that as on date, JNPC has stopped construction of the ponds and the storm water drains, due to objections raised by the villagers of Thanam Village.

Industrial Safety Precautions:

14. The Government of Andhra Pradesh has issued GO RT No. 156 dated 04.08.2020 and GO RT No. 79 dated 03.08.2022, in terms of which, a District Level Safety Audit Committee has been constituted to supervise the hazard potential of the industries in the district. Pursuant to the same, 182 industries



have been identified and inspected by the committee, and recommendations have been issued to the industries to avoid/control accidents.

15. Apart from the above, it may be noted that the APPCB is regularly monitoring the common facilities and the member industries in JNPC, and carrying out an inspection every 6 months to verify whether activities are being carried out in compliance with the consent conditions/directions issued by the APPCB from time to time.

16. In view of the above, it is submitted that as such, all operations of the JNPC are in accordance with law and there are no violations/pollution, as alleged in the Original Application under reply, or otherwise. It is submitted, for reasons more elaborately set out hereinbelow that the Original Application ought to be dismissed by this Hon'ble Tribunal.

PRELIMINARY SUBMISSIONS

17. At the outset, it is submitted that the Applicants, while seeking to invoke the jurisdiction of this Hon'ble Tribunal under Section 14 of the National Green Tribunal Act, 2010 (NGT Act), have failed to even plead, leave alone prove, that the question(s) sought to be raised in the present case arise out of implementation of any of the enactments specified in Schedule I of the NGT Act. The present Application is therefore *ex-facie* not maintainable and liable to be dismissed *in limine* on this ground alone.

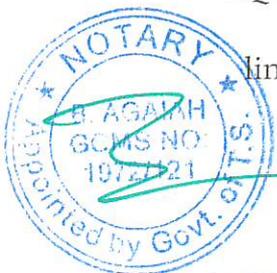
18. Without prejudice to the above, it is submitted that the main allegations against the 6th Respondent in the captioned Original Application are that (a) there is



allegedly excessive pollution being caused by the 6th Respondent; and (b) the 6th Respondent is dumping chemical waste in an allegedly illegal landfill near Thanam village, and the said landfill is being expanded.

19. It is submitted that these above allegations are wholly false, frivolous and meritless and contrary to public records. With respect to the allegation of pollution, it is submitted that as stated hereinabove, JNPC has taken various steps to address concerns and prevent pollution from the pharmaceutical industries. These steps taken by the JNPC are in accordance with applicable law and with the approval of the APPCB. As stated hereinabove, studies have demonstrated that the water, air and soil quality is well within permissible limits. Therefore, the allegations in the Original Application as to pollution are wholly false and frivolous.

20. With respect to the landfill, it is submitted that for waste having Calorific Value (CV) less than 2500 kcal/kg and not incinerable, the same is being filled in a secured landfill facility following waste stabilization methods that make the waste suitable for landfilling, strictly in consonance with the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016. An Environment Impact Assessment (EIA) for the landfill commissioned by the MOEF, as referred to by the Applicants themselves, confirms that the Ambient Air Quality and the Water Quality to be satisfactory. Furthermore, basis various mitigation measures, the impact of the facility on Air and Water Quality has also been analyzed and concluded to be well within permissible limits. In fact, far from being detrimental to the environment, such facility has



actually been found to be in the interests of and necessary for effective waste management. The landfill therefore is not illegal as alleged by the Applicant nor is there any illegal or indiscriminate dumping being done by the 6th Respondent. It is further submitted that the 6th Respondent is not expanding the existing landfill, but has sought and, after detailed scrutiny by the authorities concerned, obtained the requisite permissions, including Consent to Establish (CTE) and Environmental Clearance (EC), for a new landfill to the west of the existing landfill. It is submitted that work has not yet commenced for the new landfill.

21. In light of the above, it is clear that the captioned Original Application is wholly bereft of merit. Accordingly, it is humbly submitted that the Original Application is a gross abuse of legal process and has been filed with *mala fide* and ulterior motives best known to the Applicants and is accordingly liable to be dismissed with exemplary costs.

PARAGRAPH-WISE SUBMISSIONS:

22. In furtherance of the Preliminary Submissions, the paragraph-wise response of the Answering Respondents to the captioned Application is as follows:

23. The contents of Paras I and II are matters of record and hence merit no response.

With regard to Para III, it is denied that the application raises any substantial questions or makes out any case pollution by JNPC, as alleged or at all and therefore, the question of any compensation or rehabilitation measures as claimed, more particularly against the 6th Respondent, does not arise.



24. With respect to the contents of Paragraph 1, for the reasons set out elaborately above, it is denied that the operations of the 6th Respondent have caused any deterioration of the environmental quality of Thadi Village, or that air, water or soil pollution has occurred. It is denied that the operations have posed any threat to the health or well-being of the residents. It is denied that there has been any disregard of environmental regulations.
25. With respect to Paragraph 2, it is denied that the environmental impact of the 6th Respondent has been negative or that the Pollution Index ("PI") categorised it as a 'red zone'. The 6th Respondent puts the Applicant to strict proof as to the purported data alleged to have been examined in this regard.
26. With respect to Paragraph 3, it is denied that the multitude of pharmaceutical companies within the 6th Respondent exacerbates the situation or amplifies environmental concerns. It is denied that the companies within the 6th Respondent have generated waste or emissions that contribute significantly to pollution levels. For the reasons set out elaborately above, it is submitted that all operations of the 6th Respondent are strictly in accordance with applicable environmental laws and regulations and all allegations and contentions to the contrary are vehemently denied.
27. With respect to Paragraph 4, it is denied that there is any regulatory oversight in the conferment of Special Economic Zone (SEZ) status on the 6th Respondent or that the enforcement mechanisms are insufficient. It is denied that the 6th Respondent has failed to take any concrete action, as alleged. It is vehemently



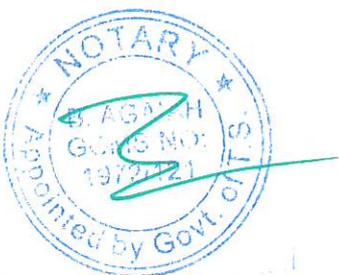
denied that any pollution persists unabated, as alleged, or that it is wreaking havoc on the health or the livelihood of the community in Thadi village.

28. With respect to Paragraph 5, it is denied that the situation in Thadi village has reached a critical juncture or that the health/well-being of the residents are compromised. It is denied that the 6th Respondent has violated any environmental regulations or caused any detriment to the air, water or soil quality in the nearby area.

29. With respect to Paragraphs 6, 7 and 8, it is denied that there has been pollution emanating from the pharmaceutical companies or that it has led to numerous health issues among villagers, as alleged or otherwise. It is denied that the 6th Respondent has not taken any actions or efforts with respect to pollution, as enumerated above.

30. With respect to Paragraph 9, it is wholly denied that the ground water in Thadi or surrounding villages has become polluted. It is denied that villagers are being compelled to purchase water. It is further denied that there was any delay or failure on the part of the 6th Respondent with regard to provision of water supply, in as much as the same was admittedly within the purview of the Government of A.P., and/or its instrumentality, i.e. APIIC.

31. With respect to Paragraph 10, the contents thereof are false and misleading and hence denied. It is submitted that in terms of the undertaking given by the CEO of the 6th Respondent, employment opportunities have been provided to the



fishermen in both the 6th Respondent as well as in the pharmaceutical companies.

32. With respect to Paragraph 11, it is submitted that employment in the industries has been provided to the villagers, based on their educational and other qualifications.

33. With respect to Paragraphs 12, it is submitted that as stated hereinabove, the 6th Respondent has implemented a range of pollution control measures, all of which are monitored and approved by the competent authorities from time to time. It is pertinent to note that in the very same minutes referred to by the Applicant in the paragraph under reply, the 6th Respondent had clearly notified the fact that as per the terms of award of the project, rehabilitation and resettlement was not within its scope as developer and was in fact within the purview of the Government.

34. With respect to Paragraphs 13 to 16, it is denied that the activities of the 6th Respondent are hazardous or that there has been any 'continuous pollution', as alleged or otherwise. As elaborately set out above, the 6th Respondent has taken various measures in accordance with law to address all concerns regarding its activities.

35. With respect to Paragraph Nos. 17 to 21, it is denied that there is any illegal chemical dump or any massive expansion thereof, as alleged. It is submitted that as stated above, for the purposes of waste management, waste having

Calorific Value (CV) less than 2500 kcal/kg and not incinerable, the same is



being filled in a secured landfill facility following waste stabilization methods that make the waste suitable for landfilling, strictly in consonance with the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016. An Environment Impact Assessment (EIA) for the landfill commissioned by the MOEF, as referred to by the Applicants themselves, confirms that the Ambient Air Quality and the Water Quality to be satisfactory. Furthermore, basis various mitigation measures, the impact of the facility on Air and Water Quality has also been analyzed and concluded to be well within permissible limits. It is further submitted that the 6th Respondent is not expanding the existing landfill, but has sought and, after detailed scrutiny by the authorities concerned, obtained the requisite permissions, including Consent to Establish (CTE) and Environmental Clearance (EC), for a new landfill to the west of the existing landfill. In view of the same, it is vehemently denied that there is any indiscriminate dumping of chemical waste or any other environmental violations/pollution, as alleged or otherwise. It is submitted that the 6th Respondent has ensured that sustainable waste management practices and eco-friendly industrial processes are being followed.

36. With respect to Paragraph Nos. 22 and 23, it is vehemently denied that the 6th Respondent has not ensured fulfilment of its CSR obligations. It is submitted that the 6th Respondent, as part of its CSR initiatives through the Ramky Foundation, regularly carries out blood donation camps as well as activities for child and women welfare in the neighboring villages, including Thadi, with the aim of catalysing social change and development.



37. With respect to Paragraph Nos. 24 and 25, it is submitted that as stated above, the relevant environmental authorities (including the MOEF & CC, the APPCB and the CPCB) are monitoring the activities of the 6th Respondent. It is submitted that as and when recommendations/reports are issued to the 6th Respondent by these authorities, the 6th Respondent has ensured swift and proper implementation/compliance. It is vehemently denied that the 6th Respondent is being granted any special treatment, as alleged or otherwise. In this regard, it is submitted that in the event of failure to comply/implement, the APPCB /CPCB has even issued closure notices / penalty notices to industries operating within JNPC. Therefore, the Applicant's allegations in this regard are wholly misplaced.

38. With respect to Ground A, for the reasons set out elaborately above, it is denied that the 6th Respondent has polluted Thadi or its hamlet villages or that the living conditions of the Applicants have deteriorated or become miserable, as alleged or otherwise.

39. With respect to Ground B, for the reasons set out elaborately above, it is denied that there is any illegal landfilling near Thanam village or that there is any adverse impact on agriculture/ground water. It is denied that any stringent action is liable to be taken against the 6th Respondent.

40. Grounds C, D, E and I do not pertain to this Answering Respondent and thus merit no response from it.



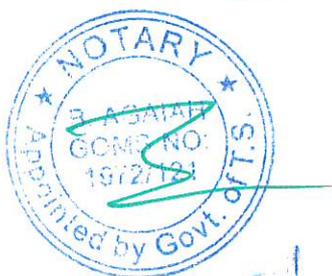
41. With respect to Ground F, G and H, it is submitted that the same has no application to the facts of the present case, as the 6th Respondent has neither committed any violation of environmental or other laws and regulations, nor has caused any harm to the Applicants/other villagers residing near the Pharmacy.

42. With respect to the paragraph on limitation, it is denied that there has been any soil, water pollution or land filling by the 6th Respondent. Further it is denied that the acts of the Respondents are in derogation of rule of law and Environment Protection Act, 1986, Air and Water Acts. No cause of action, let alone a continuing one is made out by the petition, more so against the Respondent No. 6.

43. In light of the reasons and submissions contained in the paragraphs hereinabove, it is submitted that the Main Prayer(s) as well as Interim Relief(s) sought for in the captioned Original Application are wholly unsustainable and liable to be rejected.

44. For reasons stated above, the 6th Respondent most humbly prays that this Hon'ble Tribunal may be pleased to dismiss the Original Application No. 130 of 2024 (SZ) with costs, and thus render justice.

Dated at Hyderabad on this the 9th day of July 2024.




FOR RESPONDENT NO. 6



VERIFICATION

I, Dr. Divakar Marri, Director of the 6th Respondent herein, do hereby verify and state that the contents of the above reply statement are true and correct to the best of my knowledge, belief and information.


FOR RESPONDENT NO. 6





ATTESTED
B. Agaiiah
B. AGAIAH, B.A., LL.M
ADVOCATE / NOTARY
Indra Reddy Allwyn Colony,
Miyapur, R.R. Dist., G.O.M.S., No.1972/121
My Commission Expires on 15-11-2026

BEFORE THE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI

O.A. No. 130 of 2024

IN THE MATTER OF:

Boddapalli Apparao & Ors.

...Applicants

Versus

Union of India & Ors.

...Respondents

AFFIDAVIT ON BEHALF OF THE 6th RESPONDENT

I, Dr. Divakar Marri, son of Venkat Rao, aged about 48, having my address at 15th Floor, Ramky Grandiose, Sy.No.136/2 & 4, Gachibowli, Hyderabad-500032, do hereby solemnly affirm and state as follows:

1. I am the Authorised Signatory of the 6th Respondent in the above-mentioned application, and as such, am conversant with the facts and circumstances of the case and am competent to swear to this affidavit.
2. I have read the contents of the accompanying reply to the above-mentioned application and the contents of the same are true as per the verification.
3. The Annexures filed along with the present reply are the true copies of their respective originals.

Solemnly affirmed his name at Hyderabad)

On this the 9th day July, 2024)

And signed his name in my presence)




BEFORE ME



ATTESTED

B. AGAIAH, B.A.,LLM
ADVOCATE / NOTARY
Indra Reddy Allwyn Colony,
Miyapur, R.R. Dist., G.O.M.S, No.1972/121
My Commission Expires on 15-11-2026