

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH NEW DELHI

OA No. 326 /2024

In the matter of

Jogindra Kumar

Applicant

Versus

State of U.P. & Ors

Respondents

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Date: 15.04.2025**New Delhi****FILED BY:-****RAHUL KHURANA & HASIL JAIN****Advocates****Chamber No. 295, Lawyer Chamber Block II****Delhi High Court, New Delhi****M. 9811894060, 7838707338****rkhuranalegal@gmail.com, advjain25@gmail.com**

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**OBJECTIONS/RESPONSE BY THE APPLICANT TO THE JOINT
COMMITTEE REPORT DATED 16.12.2024**

MOST RESPECTFULLY SHOWETH:

1. That the Hon'ble Tribunal is considering the grievance of the Applicant related to the illegal manner in which the fly ash generated by the Respondent no. 4, is disposed of by dumping it on the roadside at Khatauli- Miranpur Road and Jansath-Flawda road, District Muzaffar Nagar, Uttar Pradesh.
2. That in this regard Joint Committee has submitted report dated 16.12.2024 whereby it has stated that on inspection it did not found the fly ash on the Khatauli Miranpur Road AND Jansath Flawda Road originating from Khatauli.
It is submitted that the UPPCB in its inspection dated 03.05.2024 has found fly ash upto depth of 1.5 meter on Jansath -Flawda road.
3. That further, the Applicant in this present objection is filing the latest photographs dated 14.04.2025 which clearly show the presence of flyash alongside the road at Jansath Road. The particular point is Khanjahanpur situated at Jansath Road where

the incident of burning of Munesh Devi took place. The photographs are annexed as **ANNEXURE A-1**.

4. It is submitted that Respondent no,4 is still illegally disposing of the flyash but now it has changed the places. That the Respondent no.4 is now disposing of the flyash by dumping at the road at the back side of the Ladpur village and this road joins the Upper Ganga canal road.
5. The specific point is in front of health centre namely "Swasthya Up-kendra avam health and wellness centre village Ladpur, Khatauli". The photographs from this point are annexed as **ANNEXURE A-2**.
6. It is submitted that the current disposal point is just 1 km away from the Respondent no.4 Unit. And thus it is convenient for the Respondent no.4 Unit to dump secretly the flyash inviting further cases of accidental burning of local people.

PRAYER

It is humbly prayed before the Hon'ble Tribunal to kindly take the above objections on record.

Date: 15.04.2025



Applicant

Through



Counsel

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AFFIDAVIT

I, Jogindra Kumar S/o Sukhbir Singh , Ladpur, Muzaffar Nagar Khatauli Uttar Pradesh 251201 do hereby solemnly affirm and declare as under :

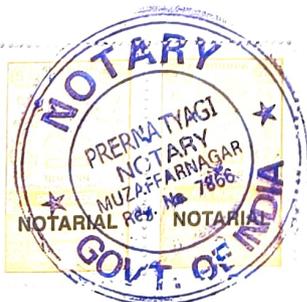
1. That I am the applicant in the captioned matter and such I am well conversant with the facts of the case and thus competent to depose this affidavit.
2. That the accompanying response and photographs have been prepared and placed on record by the counsel of Applicant on the instructions of the Applicant.
3. That the contents of the present Affidavit are true and correct and no part is false.

Jogindra Kumar
DEPONENT

Verification

Verified at 15 on 15 that the contents of above affidavit are true and correct to the best of my knowledge. Nothing has been concealed in it.

Jogindra Kumar
DEPONENT



Jogindra Kumar
I swear before me that.....
The deponent.....
is/are identified by Shri.....
I have satisfied myself by examining the deponent who has read out the contents of the affidavit which has been read out and explained by me to the deponent. Fee charged Rs.....
NOTARY, DISTT. MUZAFFARNAGAR

PRERNA TYAGI
NOTARY
MUZAFFARNAGAR
15 APR 2025

Identified by
Sachin





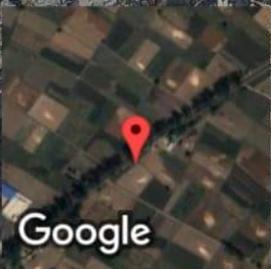
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 GPS Map Camera



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 **GPS Map Camera**



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GPS Map Camera



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 **GPS Map Camera**

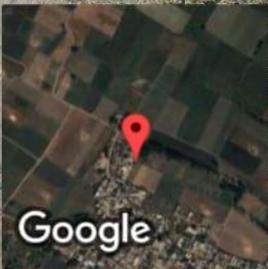


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 GPS Map Camera



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