

**IN THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
ORIGINAL APPLICATION NO. 1098/2024**

IN THE MATTER OF:

Brigadier Paramjit Singh & Ors.

..... ORIGINAL APPLICANTS

VERSUS

State of Haryana & Anr.

.....RESPONDENTS

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KUSHAL CHOUDHARY | ANGAD AHLUWALIA

211, Surya Kiran Building,
19 KG Marg, New Delhi-110001

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Ph. No. +91-9999502544

Date: 06.10.2025

Place: New Delhi

**IN THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI
ORIGINAL APPLICATION NO. 1098/2024**

IN THE MATTER OF:

Brigadier Paramjit Singh & Ors.

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**STATEMENT OF OBJECTIONS ON BEHALF OF THE APPLICANTS
TO THE STATUS REPORT DATED 16.01.2025 FILED BY THE JOINT
COMMITTEE CONSTITUTED IN COMPLIANCE WITH ORDER
DATED 04.09.2024 PASSED BY THIS HON'BLE TRIBUNAL.**

MOST RESPECTFULLY SHOWETH:

1. That the present original application assails the inaction of the State and its instrumentalities in respect of preservation of the trees in the area of Sector 41 Gurugram, Haryana (“**subject area**”). The construction activities undertaken in the said area have resulted in cutting of several trees in gross violation of the provisions of the Forest Conservation Act, 1980. It is further pertinent to note that this Hon’ble Tribunal in Original Application No. 374/2022 titled “*Green Earth vs. Dy. Commissioner, Kurukshetra & Ors.*” has already expressed its disapproval of rampant cutting of trees in dearth of regulations in the State and has conclusively held that preservation of trees is a duty incumbent upon the State. Reliance is also placed on the Order of this Hon’ble Tribunal in Original Application No. 1043/2018 titled “*Naresh Yadav vs. Union of India & Ors.*” in which case, this Hon’ble Tribunal has penalised M3M Builders for illegal felling of the trees in the State of Haryana.
2. That on 04.09.2024, while issuing notice in the present matter, this Hon’ble Tribunal was pleased to form a Joint Committee comprising of a representative of the Member Secretary, HSPCB, DCF Gurugram and DM,

Gurugram (who was directed to act as the coordinating agency) to ascertain the correct factual situation at the ground level. In pursuance of this, the Joint Committee was directed to visit the site to ascertain the truthfulness of the allegations of illegal felling of trees and to find out the persons responsible for the same, and if the allegations were found to be correct, to submit a report before this Hon'ble Tribunal within eight weeks of the said order.

3. That in pursuance of the order as aforementioned, report dated 16.01.2025 was filed before this Hon'ble Tribunal, objections to which, on behalf of the Applicants are *as infra*:

- a. That though this report finds that no permissions were granted to any person/organisation for felling of trees in the subject area during the relevant period, the committee only conducted physical inspection of 3 plots, i.e. Plot No. C-76, 100 & 101, thereby unnecessarily narrowing the scope of the present *lis*. It is pertinent to note that this Hon'ble Tribunal had specifically directed inspection of the entire subject area to ascertain the *factum* of tree felling, as well as to gauge the scope of the illegal felling. By way of only inspecting 3 plots of land, other portions of the subject area have been completely left out of the scope of inspection by the committee, in contravention with its mandate assigned by this Hon'ble Tribunal.
- b. That these 3 plots were only targeted as they were specifically brought out by the Applicant vide the photographs annexed with the present original application, however, the Applicant had extremely limited resources and wherewithal to conduct a full inspection of the subject area, which was then incumbent upon the committee and its officers to sufficiently discharge their mandate, which it failed to do. That even after issuance of notice on 04.09.2024 by this Hon'ble Tribunal in the present OA, the

Applicants noticed that several other trees had also been cut down in the subject area.

Photographs along with time stamps, of trees cut down post issuance of notice and constitution of joint committee by this Hon'ble Tribunal are at **Annexure-A**.

- c. That the Joint Committee has failed to sufficiently discharge its mandate by only focussing on 3 plots of land, as aforementioned. Even with respect to these 3 plots, the *factum* of existence of trees was looked into using google images of the year 2021. It is most respectfully submitted that the development of the subject area was done by M/s Unitech Ltd (“**Developer**”). In order to conduct a holistic investigation into the *factum* of tree felling, it was incumbent upon the Committee to seek the development records and maps of the relevant time from the developer which would have provided the committee with specific details of the exact locations where trees were originally placed. Juxtaposing that data with the present status of green cover in the subject area would have brought to fore the extent of the illegal felling of trees, as well as pointed the Committee towards finding the perpetrators involved in the said acts. Though residents wrote to M/s Unitech Ltd. seeking this data, said request remains un-reverted till date.

A copy of Letter dated 11.12.2024 sent to M/s Unitech Ltd. by the Applicants is at **Annexure-B**.

4. Thus, in view of the above, it becomes abundantly clear that though the Committee finds that there has been illegal felling of trees in the subject area, it unnecessarily limited its investigation to only 3 plots in the subject area, and has remained silent with respect to the remaining parts, which is in direct contravention with its mandate. Hence, it is prayed that this Joint Committee may be directed by this Hon'ble Tribunal to conduct proper investigation in

the *factum* of tree felling in the entire subject area as well as to bring to the fore all perpetrators who have undertaken such illegal acts.



APPLICANT NO.1

Through



KUSHAL CHAUDHARY | ANGAD AHLUWALIA

211, Surya Kiran Building,
19 KG Marg, New Delhi-110001

Email: kushalch14@gmail.com

Ph. No. +91-9999502544

Date: 06.10.2025

Place: New Delhi

BEFORE THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
O.A. NO. 1098 OF 2024

IN THE MATTER OF:

Brigadier Paramjit Singh & Ors. ...Original Applicants
State of Haryana & Ors. Versus ...Respondents

AFFIDAVIT

I, Brigadier Paramjit Singh (Retd.), S/o Late Col. Ranbir Singh, R/o House No. C-108 South City-1, Gurugram, Haryana-122022, presently at New Delhi, do hereby solemnly affirm and declare as under:

- 1. That I am the Applicant No. 1 in the present matter and as such am fully conversant with the facts of the present case and can swear the present affidavit.
- 2. That I say that the contents of the accompanying objections have been read over and explained to me and the same is being filed under my instructions and that I am fully conversant with the facts mentioned in the present application and the same are true and correct and nothing material has been concealed therefrom.

DEPONENT

VERIFICATION

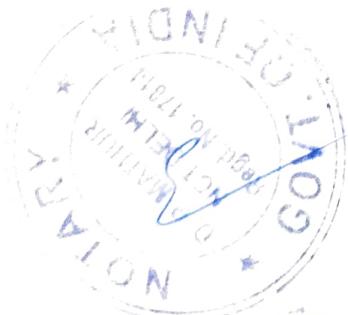
Verified that the contents of the paras 1 to 2 of the above affidavit are true and correct to my personal knowledge. No part thereof is false and no material facts has been concealed therefrom.

Solemnly affirmed on this 06 day in the month of October 2025 at New Delhi

DEPONENT

Identified by
Adm

My Commission expires on 22/12/2025



ATTESTED

22/10/2025

NOTARY PUBLIC, DELHI NCR (INDIA)

1-D/Adhkar no: 4000-7587-5591, 16557-0001, 16557-0001
D/O: 02-01-1967

Regd. Entry No. 10
06-10-2025

06 OCT 2025

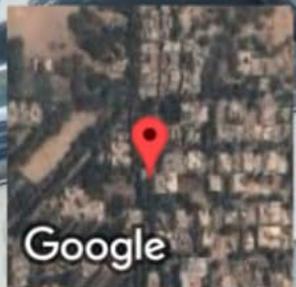


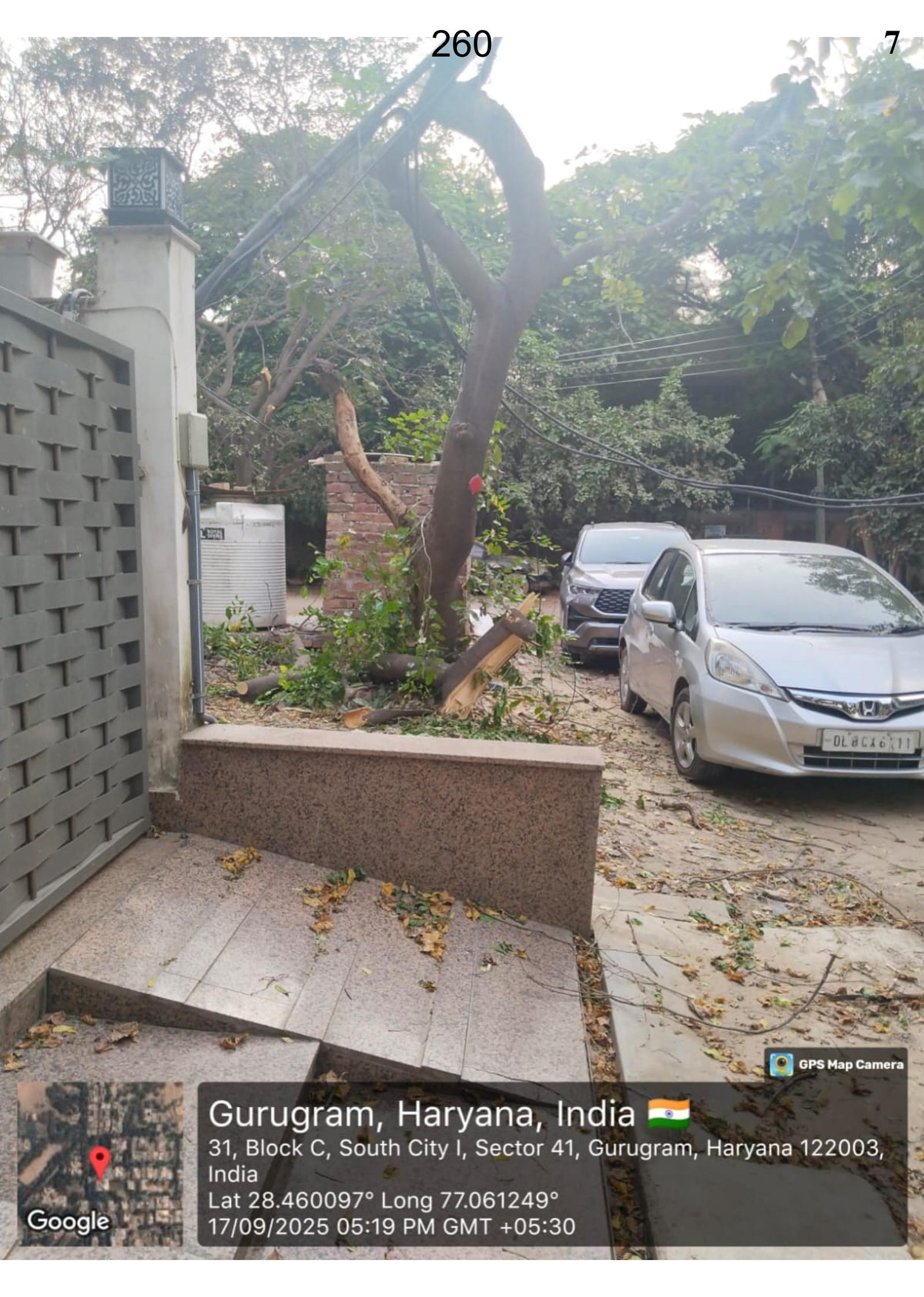
GPS Map Camera

Gurugram, Haryana, India 

C75, Block C, South City I, Sector 41, Gurugram, Haryana
122007, India

Lat 28.460093° Long 77.061118°
17/09/2025 05:19 PM GMT +05:30





GPS Map Camera



Gurugram, Haryana, India



31, Block C, South City I, Sector 41, Gurugram, Haryana 122003, India

Lat 28.460097° Long 77.061249°

17/09/2025 05:19 PM GMT +05:30

Google



Rushal Choudhary

Advocate
BA.LLB, P.G.D. (Cyber Law)

211, Surya Kiran Building,
19 KG Marg, New Delhi-110001
+91-9999502544; kushalch14@gmail.com

To,
The Chairman & MD,
Unitech Limited,
Tower B, Signature Tower, South City 1,
Gurugram, Haryana

Date: 11.12.2024

**REQUEST FOR MAPPED LOCATION OF TREES AT SOUTH CITY-1,
GURUGRAM, HARYANA-122001**

Dear Sir,

1. As you are aware, dwindling green cover across the city is a growing cause for concern, and a grave emergent factor contributing towards environmental degradation. In the context a group of civic minded citizens have approached the Hon'ble NGT, for seeking reprieve in this critical matter vide OA No. 1098/2024.
2. From the time of developing South City 1, Unitech had taken the worthy steps for planting hardy and environmentally conducive trees along all lanes of the colony, numbering two to three in front of every demarcated plot, apart from the numerous green areas. However, it has been observed that a significant number of these trees have disappeared over time, evidently having been removed in callous manner especially by those constructing multistory buildings on the plots.
3. In order to curb such ecologically deleterious practices, a clear picture and understanding of the tree density *ab initio* and the sparse status currently, is sought to be submitted to the Hon'ble NGT as part of the pending *lis*.
4. Thus, it is requested that you may kindly provide the related details, for instance the variety, numbers, locations, *inter se* gaps, layout sketched, photos etc., of the trees planted by Unitech Limited at South City 1 since this data would have factored into the layout plan for South City-1 at the time of its development.

This is for your kind reference and necessary action please

Regards,

Kushal Choudhary

Advocate for the Applicants in OA No. 1098/2024

Copy To:

- a. **Haryana State Pollution Control Board**

C-11, Sector-6, Panchkula,
Haryana – 134109

b. Sh. Vijender Singh, IFS

DCF Gurugram,
Haryana Forest Department
Van Bhawan, C-18, Sector-6
Panchkula, Haryana-134109.

c. Sh. Ajay Kumar, IAS

Deputy Commissioner, Gurugram
Deputy Commissioner Office, First Floor,
Mini Secretariat, Gurugram
Haryana -122001



ED757340235IN IVR:6968757340235
SP CONNAUGHT PLACE SO <110001>
Counter No:2,11/12/2024,15:36
To:HARYANA STATE,C-11 SEC 6
PIN:134109, Panchkula Sector 8 S.O
From:KUSHAL CHOU,211 SURYA KIRAN
Wt:20gms
Amt:41.30,Tax:6.30,Amt.Paid:41.00(Cash)
<Track on www.indiapost.gov.in>
<Dial 10002666868> <Wear Masks, Stay Safe>



ED757340249IN IVR:6968757340249
SP CONNAUGHT PLACE SO <110001>
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To:VIJENDRA SING,VAN BHAWAN C-1 S
PIN:134109, Panchkula Sector 8 S.O
From:KUSHAL CHOU,211 SURYA KIRAN
Wt:20gms
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<Track on www.indiapost.gov.in>
<Dial 10002666868> <Wear Masks, Stay Safe>



ED757340116IN IVR:6968757340116
SP CONNAUGHT PLACE SO <110001>
Counter No:2,11/12/2024,15:36
To:AJAY KUMAR IA,DY COMMISSIONER
PIN:122001, Gurgaon HD
From:KUSHAL CHOU,211 SURYA KIRAN
Wt:20gms
Amt:17.70,Tax:2.70,Amt.Paid:18.00(Cash)
<Track on www.indiapost.gov.in>
<Dial 10002666868> <Wear Masks, Stay Safe>



ED757340221IN IVR:6968757340221
SP CONNAUGHT PLACE SO <110001>
Counter No:2,11/12/2024,15:36
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PIN:122001, Gurgaon HD
From:KUSHAL CHOU,211 SURYA KIRAN
Wt:20gms
Amt:17.70,Tax:2.70,Amt.Paid:18.00(Cash)
<Track on www.indiapost.gov.in>
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* Consignment Number

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Booked At	Booked On	Destination Pincode	Tariff	Article Type	Delivery Location	Delivery Confirmed On
Connaught Place SO	11/12/2024 15:31:35	134109	41.30	Inland Speed Post	Panchkula Sector 8 S.O	16/12/2024 16:27:08

Event Details For : ED757340235IN

Current Status : Item Delivered(Addressee)

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16/12/2024	10:13:25	Panchkula Sector 8 S.O	Out for Delivery
16/12/2024	08:51:01	Panchkula Sector 8 S.O	Item Received
14/12/2024	05:21:44	TMO Ambala RMS	Item Dispatched
14/12/2024	05:03:23	TMO Ambala RMS	Item Received
14/12/2024	04:46:26	Ambala NSH	Item Dispatched
13/12/2024	23:25:43	Ambala NSH	Item Bagged
13/12/2024	18:36:21	Ambala NSH	Item Received
13/12/2024	12:06:36	TMO Ambala RMS	Item Dispatched
13/12/2024	11:39:38	TMO Ambala RMS	Item Received
13/12/2024	04:30:10	Delhi Rs TMO	Item Dispatched
13/12/2024	02:31:50	Delhi Rs TMO	Item Received
12/12/2024	04:00:00	New Delhi NSH	Item Bagged
11/12/2024	17:52:26	Connaught Place SO	Item Dispatched
11/12/2024	16:55:42	Connaught Place SO	Item Bagged
11/12/2024	15:31:35	Connaught Place SO	Item Booked

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14/12/2024	05:03:23	TMO Ambala RMS	Item Received
14/12/2024	04:46:26	Ambala NSH	Item Dispatched
13/12/2024	23:25:43	Ambala NSH	Item Bagged
13/12/2024	18:39:34	Ambala NSH	Item Received
13/12/2024	12:06:36	TMO Ambala RMS	Item Dispatched
13/12/2024	11:58:07	TMO Ambala RMS	Item Received
13/12/2024	04:30:10	Delhi Rs TMO	Item Dispatched
13/12/2024	02:31:50	Delhi Rs TMO	Item Received
12/12/2024	03:22:45	New Delhi NSH	Item Bagged
11/12/2024	17:52:26	Connaught Place SO	Item Dispatched
11/12/2024	16:55:42	Connaught Place SO	Item Bagged
11/12/2024	15:31:35	Connaught Place SO	Item Booked

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Booked At	Booked On	Destination Pincode	Tariff	Article Type	Delivery Location	Delivery Confirmed On
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12/12/2024	06:00:00	New Delhi NSH	Item Dispatched
12/12/2024	03:00:00	New Delhi NSH	Item Bagged
11/12/2024	17:52:26	Connaught Place SO	Item Dispatched
11/12/2024	16:55:42	Connaught Place SO	Item Bagged
11/12/2024	15:31:35	Connaught Place SO	Item Booked

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13/12/2024	05:21:42	Gurgaon Sorting TMO	Item Dispatched
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12/12/2024	14:00:00	Gurgaon Sorting TMO	Item Dispatched
12/12/2024	08:32:31	New Delhi NSH	Item Dispatched
12/12/2024	06:00:00	New Delhi NSH	Item Dispatched
12/12/2024	04:00:00	New Delhi NSH	Item Bagged
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11/12/2024	15:31:35	Connaught Place SO	Item Booked

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**Affidavit of Service in Brigadier Paramjit Singh & Ors vs State of Haryana & Ors.
O.A. 1098 / 2024**

1 message

ahluwalia&choudhary <ahluwalia.choudhary@gmail.com>

Wed, Oct 8, 2025 at 7:47 PM

To: "rkhuranalegal@gmail.com" <rkhuranalegal@gmail.com>, Tarun kamra <cummra3@gmail.com>, md@kavahomes.com

Sir,

Please find attached a copy of the Statement of Objection being titled "Brigadier Paramjit Singh & Ors vs State of Haryana & Ors. O.A. 1098 / 2024 pending before the National Green Tribunal Principal Bench At New Delhi.

Kindly consider this mail as effective service of the Statement of Objection upon you.

Please take note.

-- Best Regards,
Kushal Choudhary
Advocate
BA.LLB, P.G.D. (Cyber Laws)
Mob: +91- 9999502544
Email: kushalch14@gmail.com

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Chambers : 12-GF, S-Block, Delhi High Court Complex
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