

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

**O.A. No. 622 of 2024**

**IN THE MATTER OF:**

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

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4041

FILED THROUGH:

*Sb*

*Archana Yadav*

*Shivani Chawla*

[SIDDHARTH BATRA], [ARCHANA YADAV] [SHIVANI CHAWLA]

*Chinmay*

*Rhythm*

[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 21- M/s Kuchal Fashions Pvt. Ltd.

8A, Sagar Apartments, 6-Tilak Marg,

New Delhi-110001.

Mob.: 9888884445

Date: 26.05.2025

E-mail: [siddharth.batra@satramdass.com](mailto:siddharth.batra@satramdass.com)

Place: New Delhi

Phone: 011 4704 6111

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

**O.A. No. 622 of 2024**

**IN THE MATTER OF:**

Varun Gulati ...Applicant

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**OBJECTIONS TO THE REPORT OF THE JOINT COMMITTEE ON  
BEHALF OF RESPONDENT NO. 21, M/S KUCHAL FASHIONS PVT.  
LTD.**

**MOST RESPECTFULLY SHOWETH:**

1. That the present objections are being filed on behalf of M/s Kuchal Fashions Pvt. Ltd., Respondent No. 21, in compliance with the order dated 27.02.2025 passed by this Hon'ble Tribunal wherein the newly impleaded respondents were directed to file their objections to the Joint Committee Report dated 03.01.2025. As per the order dated 08.01.2025, the Answering Respondent has been impleaded as Respondent No. 21 along with other industries based on the Joint Committee Report.
2. That at the outset, it is submitted that the observations recorded in the Joint Committee Report do not fully reflect the compliance status of the answering respondent, and certain findings therein are based on

erroneous assumptions, miscalculations, and an outdated compliance assessment.

3. That the answering respondent has undertaken substantial investments in advanced environmental control measures to ensure strict adherence to all applicable environmental norms. The answering respondent denies any deliberate non-compliance and submits that the alleged deficiencies, if any, were either technical in nature or have already been rectified through corrective measures undertaken post-inspection.

4. **OBJECTIONS TO THE JOINT COMMITTEE REPORT**

- 4.1. That the Answering Respondent submits that an inspection was conducted on 12.08.2024, and certain observations were recorded regarding the operation of its Primary Effluent Treatment Plant (in short "PETP"). The Answering Respondent further submits that a Show Cause Notice (in short "SCN") dated 02.01.2025, was issued by the Haryana State Pollution Control Board (in short "HSPCB"). The Joint Committee Report and the SCN alleged that the specific freshwater consumption of the answering respondent is excessively high in comparison to the prescribed standards; The characteristics of the PETP inlet and outlet reflect an unusually high reduction in BOD and COD, which has been assumed to indicate dilution with freshwater at different stages; and The BOD levels at the PETP inlet are significantly lower than the expected industrial range, which again has been presumed to indicate dilution. The Answering Respondent submits that these allegations are based on incorrect assumptions and

have already been clarified with supporting documentation submitted in response to the Show Cause Notice.

- 4.2. That it is submitted that all of the above issues were raised in the Show Cause Notice issued by HSPCB, to which the answering respondent submitted a detailed and reasoned response. The answering respondent duly clarified its position and provided documentary evidence of its compliance to HSPCB. Therefore, the continued reliance on these findings is unjustified and does not accurately reflect the present compliance status of the unit. A Copy of the HSPCB Show Cause Notice and the reasoned response to the HSPCB Show Cause Notice along with all the relevant annexures is annexed herewith and marked as **ANNEXURE R-1**.
- 4.3. That the answering respondent categorically denies the allegation of dilution and submits that the effluent generated by the unit is routed to the CETP via a dedicated pipeline after necessary filtration. The inspection report does not establish any direct causal link between the answering respondent's PETP operations and the alleged pollution in Drain No. 6.
- 4.4. That the answering respondent is a small-scale textile unit engaged in dyeing and washing of yarns, operating within a total area of approximately 450 sq. meters, with only 150 sq. meters occupied by all its machinery. The unit operates at a low production volume of less than 100 kg/day. The water requirement for such small quantities appears disproportionately high due to the washing-intensive process, but is well within the operational characteristics of similar units.

- 4.5. That no evidence of irregularity in recording or bypassing of untreated effluent has been found during inspection. Since the water requirement is not much no borewell is available, HSIIDC water pipeline is the only water source in the company which has a installed water meter.
- 4.6. That the Joint Committee Report alleges that the freshwater consumption is significantly above the standard (50 KL/MT), without factoring in the scale of production. The unit recorded a total production of approximately 1318 kg over the 3-month period preceding the inspection, with freshwater consumption averaging 3.93 KLD. Given the micro-scale nature of the unit, the specific water consumption in KL/MT appears high, but this does not signify overuse or misuse. Also water quality and quantity used in the dyeing process primarily depends on multiple factors including the depth of shade or yarn quality. In many cases only washing is required and scouring or dyeing is not required, in such case the effluent generation in itself has a major portion of clean water in it, which might be confused with water dilution.
- 4.7. That the unit has installed magnetic flow meters at the PETP inlet and outlet, and the flow records demonstrate that there is no discrepancy between the water used and the effluent generated. As per the logbooks and flow meter readings, the average daily effluent generation is 3.24 KLD against a freshwater consumption of 3.93 KLD, showing no unexplained increase indicative of dilution.

- 4.8. That the effluent characteristics at the PETP inlet and outlet, as cited in the Joint Committee Report, show a high reduction in BOD (from 210 mg/L to 08 mg/L) and COD (from 980 mg/L to 40 mg/L). However, the answering respondent submits that these reductions are a direct result of the treatment technology in use, which includes an Ion Exchange System which has anionic 72 mono porous resin for colour removal and further 40% BOD reduction and advanced filtration units. These systems are highly efficient in reducing pollutant loads, and the observed values are consistent with the expected performance.
- 4.9. That the allegation of dilution at the PETP inlet is based on the assumption that the BOD values are too low for a textile unit. The answering respondent submits that the lower BOD values are due to the specific nature of the process undertaken, which does not generate heavily polluted effluent as compared to large-scale dyeing operations. Washing-intensive processes, as adopted by the answering respondent, inherently result in lower BOD concentrations.
- 4.10. That there is no provision or mechanism within the premises of the answering respondent for dilution of effluent with freshwater. During inspection, no bypass, hidden piping, or storage facility for freshwater mixing was observed or recorded. Hence, the assumption of dilution is wholly unfounded and speculative.
- 4.11. That all records have been maintained in accordance with the norms and were available during inspection.

- 4.12. That the unit holds a valid Consent to Operate (CTO) from HSPCB, valid up to 30.09.2029, and has also been issued valid authorization under the Hazardous Waste Rules. The existence of a valid CTO reflects that the unit was found compliant during its last review by the regulatory authority.
- 4.13. That annual inspections conducted by the Central Pollution Control Board (CPCB) have consistently found the answering respondent to be compliant with effluent treatment norms. There has been no prior adverse report against the unit indicating any willful violation.
- 4.14. That the unit has recently undertaken additional measures to ensure compliance, including the implementation of training modules for operational staff, regular third-party sampling, and engagement of environmental consultants to audit internal systems. The unit has also made provisions for partial recycling of treated effluent.
- 4.15. That the inspection report itself acknowledges that no arrangement for discharge of untreated effluent was found. This further corroborates the unit's claim that there is no scope or intent of effluent dilution within the premises.
- 4.16. That any adverse order, including closure or revocation of consent, will severely affect the livelihood of employees and other dependent stakeholders. The answering respondent provides employment directly and indirectly to a substantial number of individuals, and the socio-economic impact of closure must be considered.

- 4.17. In view of the above, it is respectfully submitted that the Joint Committee Report relies on speculative reasoning rather than empirical findings. The allegations in the SCN and the report have been adequately clarified and countered with documentary evidence. The answering respondent has always operated in compliance with the law and is willing to undertake any further corrective measures, if required.
- 4.18. That the answering respondent remains committed to environmental sustainability, regulatory compliance, and responsible industrial operations and prays for a just and fair assessment of its compliance status.
5. The answering respondent further reserves its right to file additional pleadings or affidavits, if necessary, in response to any subsequent developments in the present proceedings.

FILED THROUGH:



[SIDDHARTH BATRA], [ARCHNA YADAV] [SHIVANI CHAWLA]



[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 21- M/s Kuchal Fashions Pvt. Ltd.  
8A, Sagar Apartments, 6-Tilak Marg,  
New Delhi-110001.  
Mob.: 9888884445

Date: 26.05.2025  
Place: New Delhi

E-mail: [siddharth.batra@satramdass.com](mailto:siddharth.batra@satramdass.com)  
Phone: 011 4704 6111

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

**O.A. No. 622 of 2024**

**IN THE MATTER OF:**

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

**AFFIDAVIT**

I, Vaibhav Aggarwal S/o Narendra Kuchal, aged about 39 years R/o A189 sector 19 noida 201301, do hereby solemnly affirm and stat as under:

1. That I am the authorized signatory of Respondent No. 21 , M/s Kuchal Fashions Pvt Ltd, having its office at plot 331 ph 1 barhi ind area sonapat, in the aforesaid Original Application, I am aware of the facts and circumstances of the case in my official capacity as stated above and hence, entitled to swear this affidavit.
2. That the accompanying reply has been drafted by my counsel under my instructions, and I say that the statements and submissions made in the said reply are true and correct to best of my knowledge based upon the records and my belief. I pray that the said reply to be treated as part and parcel of this Affidavit and the same is not being reproduced for the sake of brevity.
3. I say that the documents / annexure produced along with the reply are true copies of its originals.



*[Handwritten Signature]*  
**DEPONENT**

**VERIFICATION:**

Verified that the contents of the above affidavit are true and correct to the best of my knowledge, belief and nothing material information has been concealed therefrom. No part of it is false.

Verified at Sonapat on this 20th day of february , 2025.

**21 FEB 2025**

*[Handwritten Signature]*  
**DEPONENT**



**ATTESTED**

*[Handwritten Signature]*  
**NOTARY  
DISTT. SONIPAT**

NOTARY BOOK NO: 01  
PAGE NO: 03  
SERIAL NO: 14/2025

**20 FEB 2025**

**21 FEB 2025**

**HARYANA STATE POLLUTION CONTROL BOARD**

Plot No. 1, Sector-15, Part-II, Sonipat

Ph. - 0130-2236119, E-mail ID: - [hspcbrosr@gmail.com](mailto:hspcbrosr@gmail.com)

No. HSPCB/SR/2025/2677

Dated: 02/01/25

To

M/s Kuchal Fashions Pvt. Ltd,  
Plot No. 331, HSIIDC, Barhi,  
District Gannaur, Sonipat, Haryana

**Sub: Show Cause Notice for Closure under section 33-A of Water Act, 1974, prosecution action under section 43/44 of Water Act, 1974, revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 and imposing environmental compensation as per order dated 22.12.2021.**

Whereas, the unit was inspected on 12.08.2024 by the Joint Team of CPCB and HSPCB in reference to OA No.622/2024 titled as Varun Gulati Vs State of Haryana & Ors. pending before Hon'ble NGT, New Delhi and the unit is involved in process of Desizing, Washing, Dyeing, Softening having CTO valid upto 30.09.2029.

Whereas, during inspection following deficiencies have been observed which need to be complied as per condition of CTO granted to the said unit:-

1. Specific fresh water consumption is too much higher against the std. for specific quality (Approx. 50 KL/MT), indicating that either fresh water consumption logbook is not properly/correctly maintained or actual production is higher than the reported production.
2. Effluent characteristics: as per analysis report is as below:-

Parameter	PETP inlet	PETP outlet	Prescribed discharge norms	Compliance w.r.t norms
pH	8.53	7.81	6.0-9.0	• High reduction in pollution parameters indicating dilution with freshwater in PETP at different stages • Inlet BOD is too much lower against typical range of 700-1000 mg/l, indicating dilution at PETP inlet. <b>Non-Complying (Dilution)</b>
BOD (mg/l)	210	08	500	
COD (mg/l)	980	40	1400	
TSS (mg/l)	670	16	1500	
TDS (mg/l)	1150	1320	2100	

3. With existing treatment scheme, such a high reduction in pollution parameters indicates dilution with freshwater in PETP at different stages.

Therefore, you are hereby directed to show cause & explain within **15 days** as to why closure action may not be taken against your unit u/s 33-A Water (Prevention and Control of Pollution) Act, 1974, prosecution action under section 43/44 of Water (Prevention and Control of Pollution) Act, 1974 and revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 besides initiation of legal action under the Acts for non-compliance of the relevant provisions of Environmental Acts/Rules/Laws.

In case you fail to reply/comply with the deficiencies mentioned above within above mentioned stipulated time period, it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant closure action against your unit under relevant Acts/ Rules besides initiation of legal action under the relevant Acts/Rules without giving any further notice.

Whereas, for the above said violations you are liable to pay the Environmental Compensation in terms of the directions of Board issued letter no. HSPCB/PLG/2021/2343-2350 dated 22.12.2021 as assessed by the Board as per methodology defined therein.

Endst. No. HSPCB/SR/2025/

Dated:

  
Regional Officer,  
Sonapat Region.  
RL

A copy of the above is forwarded to the Chairman, HSPCB, Panchkula for information, please.

  
Regional Officer,  
Sonapat Region.



# Kuchal Fashions Pvt. Ltd.

Dyeing of : Cotton, Viscose & Acrylic yarns

Head Office: Regional Officer

Works :

C-3/11, East of Kailash, New Delhi-110065

Plot No-331, I. E. Barhi, Distt. Sonapat

Ref. No..... Subject: -Reply of Show Cause Notice for Closure under section 33-A of Water Act, 1974, prosecution action under section 43/44 of Water Act, 1974, revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 and imposing environmental compensation as per order dated 22.12.2021. Date.....

Respected Sir,

With reference to the letter NO.HSPCB/SR/2025/2677 dated-02-01-2025 our unit was inspected by the Joint team of CPCB and HSPCB officers on 12/08/2024 as per reports submitted by them, we want to submit as under:

S.NO.	Observations	Reply
1.	Specific fresh water consumption is too much higher against the std. for specific quality (Approx. 50 KL/MT). indicating that either fresh water consumption logbook is not properly/correctly maintained or actual production is higher than the reported production	We have total land area approx. 450 square meter, out of which 150 square meters is shed area in which dyeing machineries are installed. The data submitted by us is correct and we are dye yarn below 100 kg per day. Washing is the part of our process as we have very less production and less chemicals so the ratio of washing may differ. It may be high as compare to other but we do not add any water in ETP at different stages. There is no dilution in the samples as we are well aware that we have exemption in prescribed standards, so there is no needs of dilution even our inlet parameters are below the prescribed limits. (photographs attached)
2.	*High reduction in pollution parameters indicating dilution with freshwater in PETP at different stages * Inlet BOD is too much lower against typical range of 700-1000 mg/l, Indicating dilution at PETP inlet. Non-Complying (Dilution)	As we are doing washing of yarn due to this effluent may get diluted but we are not adding any kind of fresh water in the ETP and apart from this we have ION Exchange system in which we have Anionic 72 mono porous resin for color removal and further 40% BOD reduction . Our inlet BOD never reaches up to 700 ppm.
3.	With existing treatment scheme, such a high reduction in pollution parameters indicates dilution with freshwater in PETP at different stages.	Only preliminary treatment is required in industrial area as per exemption policy but we have installed complete ETP along with filters and Ion Exchange System. Also note that our ETP inlet parameters are below prescribed limit so there is no need to add fresh water at different stages of ETP. Our production is below 100 kg per day as we have just 150 square meter area for dyeing and we are using more water in washing and this is the part of our process we are not making any dilution with freshwater in ETP at different stages.

if any other guidelines/ suggestion are required in the future please inform us and the same will be implemented in a whole heartly manner.

KUCHAL FASHIONS PVT. LTD.

Director

Sir, we are eco-friendly people and don't want any violation on account of pollution at any stage.

Thanking you

KUCHAL FASHIONS PVT. LTD.



Director

You're sincerely,

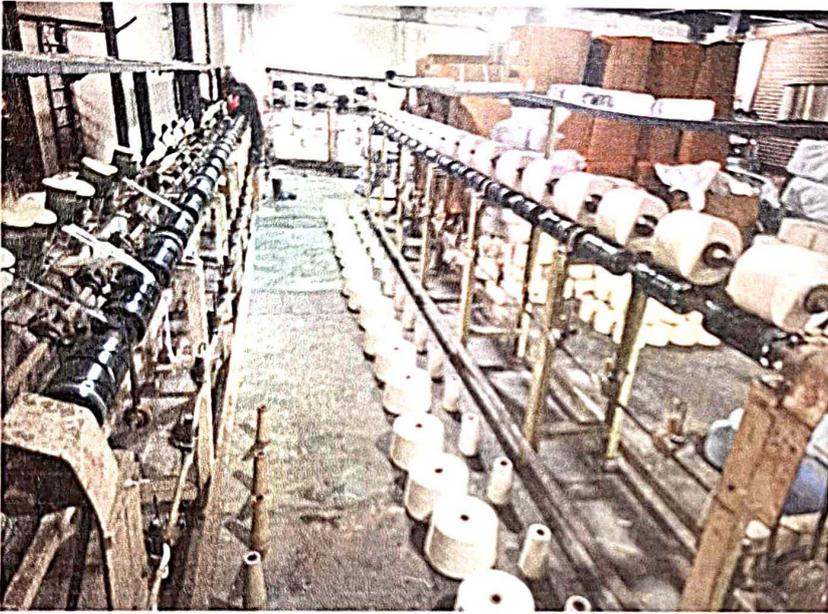
M/s Kuchal Fashions Pvt. Ltd, Plot No.  
331, HSIIDC, Barhi, District Gannaur,  
Sonipat, Haryana  
Dated 21/1/2025

**List of Enclosures:**

1. Covering letter
2. Photographs of working area.

Kuchal Fashions Pvt Ltd  
Plot 331, Barhi phase 1 sonapat

PRODUCTION HALL PICTURES



KUCHAL FASHIONS PVT. LTD.

A handwritten signature in black ink, appearing to be 'V. K.' or similar, written over a horizontal line.

Director

# VAKALATNAMA

**BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH, NEW DELHI**

**ORIGINAL APPLICATION NO. 622 OF 2024**

**IN RE:-**

**VARUN GULATI**

**...APPLICANT**

VERSUS

**STATE OF HARYANA & ORS.**

**...RESPONDENTS**

KNOW ALL to whom these presents shall come that I/We, undersigned the above named do hereby appoint.

**SIDDHARTH BATRA (P/1083/2004), ARCHNA YADAV (D/1837/2020), SHIVANI CHAWLA (D/2233/2019),  
CHINMAY DUBEY (D/8141/2021) & RHYTHM KATYAL (D/3528/2022);**

Advocates

Satram Dass B & Co., 8A, Sagar Apartment, 6 Tilak Marg, New Delhi-110001

Mob: 988888 4445, Email: [siddharth.batra@satramdass.com](mailto:siddharth.batra@satramdass.com)

(hereinafter called the advocate/s) to be my/our Advocate in the above noted case and authorize him: -

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the Appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign file, verify and present pleadings, appeals, cross-objections or petitions for executions, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage. To file and take back documents, to admit and/or deny the documents of opposite party. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case. To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes. And I/We undertake that I/We or my /our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself. And I/We the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

**IN WITNESS WHEREOF** I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 24th day of May.....2025

Accepted, identified and certified subjected to the terms of the fees.





**[SIDDHARTH BATRA] [ARCHNA YADAV]**







**[SHIVANI CHAWLA] [CHINMAY DUBEY] & [RHYTHM KATYAL]**

Advocates

**KUCHAL ECHO SOLUTIONS PVT. LTD.**



Director



# Kuchal Fashions Pvt. Ltd.

Dyeing of : Cotton, Viscose & Acrylic yarns

Head Office:

C-3/11, East of kailash, New Delhi-110065

Works :

Plot No-331, I. E. Barhi, Distt. Sonapat

Ref. No.....

Date.....

Date 18.02.2025

RESOLVED THAT Mr. Vaibhav Aggarwal, be and is hereby authorized on behalf of Kuchal Fashions Pvt Ltd, to initiate, file, defend, represent, and conduct legal cases, proceedings, or claims in any court of law, tribunal, or any other judicial or quasi-judicial authority in connection with the business or matters of the company.

RESOLVED FURTHER THAT Mr. Vaibhav Aggarwal is authorized to sign, verify, and submit all necessary documents, affidavits, pleadings, applications, and undertakings, and to appoint advocates, solicitors, and other professionals as may be required for such proceedings.

RESOLVED FURTHER THAT all actions taken by Mr. Vaibhav Aggarwal in connection with the above matters be and are hereby ratified and confirmed by the company.

RESOLVED FURTHER THAT a certified true copy of this resolution be provided to all concerned authorities as and when required for their records and reference.

Director.

Vaibhav Aggarwal.

Director.

Dinesh Aggarwal.

Director

Narendra Kuchal

**Advance service copies of short reply on behalf of Respondent Nos. 6, 14, 21, 22, 27, 30, 51, 54, 62, 87, 99 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'**

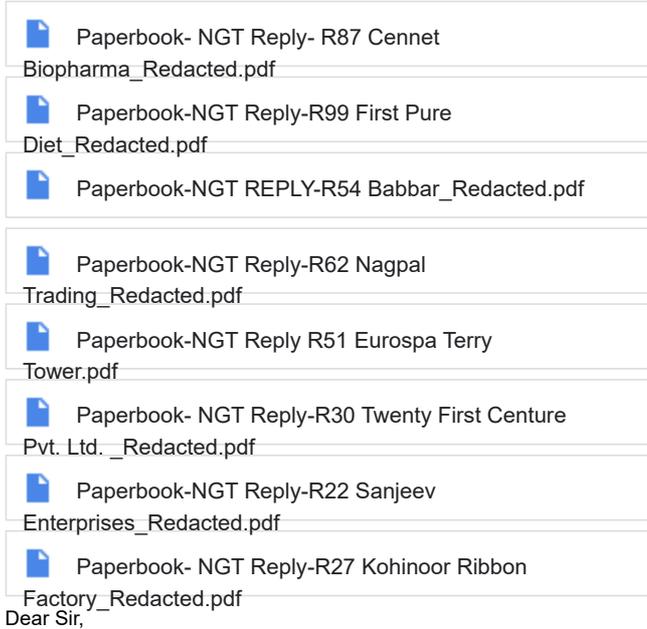
1 message

Vijay Kumar &lt;vijay.kumar@satramdass.com&gt;

Mon, May 26, 2025 at 3:26 PM

To: Mansi Chahal &lt;mansichahal104@gmail.com&gt;, Varun Gulati &lt;jansewajanhit@gmail.com&gt;

Cc: Chinmay Dubey &lt;chinmay.dubey@satramdass.com&gt;, Shivani Chawla &lt;shivani.chawla@satramdass.com&gt;, Rhythm Katyal &lt;rhythm.katyal@satramdass.com&gt;, Archana Yadav &lt;archana.yadav@satramdass.com&gt;



Dear Sir,

PFA.

Advance service copies of short reply on behalf of Respondent Nos. 6, 14, 21, 22, 27, 30, 51, 54, 62, 87, 99 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

Kindly treat the same as Proof of service.

Regards

Vijay Kumar  
Office Manager



8A Sagar Apartment  
6 Tilak Marg  
New Delhi - 110001  
Landline - +91-11-47046111  
[vijay.kumar@satramdass.com](mailto:vijay.kumar@satramdass.com)

Satram Dass B &amp; Co. made the following annotations

"This message and any attachments are solely for the intended recipient and may contain confidential or privileged information. If you are not the intended recipient, any disclosure, copying, use, or distribution of the information included in this message and any attachments is prohibited. If you have received this communication in error, please notify us by reply e-mail and immediately and permanently delete this message and any attachments. Thank you."

**3 attachments**