

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SITTING AT NEW DELHI.**

ORIGINAL APPLICATION NO. 383 OF 2024

In the matter of:

Sh. Kushal Gupta

....APPLICANT

Versus

1. State of Himachal Pradesh
2. Himachal Pradesh Public Works Department
3. M/s K.K, Mahajan Construction Pvt. Ltd.
4. Department of Fisheries, Government of Himachal Pradesh
5. Collector, Kullu Tehsil and Distt. H.P.
6. Himachal Pradesh Pollution Control Board
7. Deputy Commissioner
8. Himachal Pradesh Forest Department

....Respondent

**REJOINDER ON BEHALF OF APPLICANT TO THE
COUNTER-AFFIDAVIT BY RESPONDENT NO. 2, 5, 6, 7**

& 8

ADVOCATE FOR APPLICANT
RANA SANDEEP BUSSA

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SITTING AT NEW DELHI**

ORIGINAL APPLICATION NO. 383 OF 2024

In the matter of:

Sh. Kushal Gupta

....APPLICANT

Versus

State of Himachal Pradesh and others

...RESPONDENTS

INDEX

Sr No.	Description	Pg No.
1.	<u>REJOINDER ON BEHALF OF THE APPLICANT TO THE COUNTER-AFFIDAVIT FILED BY RESPONDENT NO. 2, 5, 6, 7 & 8</u>	1-20
2.	Proof of Service	21

Date:

Place:


RANA SANDEEP BUSSA

ADVOCATE FOR APPLICANT

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SITTING AT NEW DELHI.**

ORIGINAL APPLICATION NO. 383 OF 2024

In the matter of:

Sh. Kushal Gupta

....APPLICANT

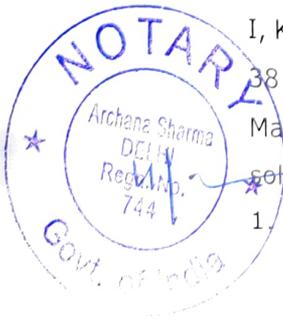
Versus

1. State of Himachal Pradesh
2. Himachal Pradesh Public Works Department
3. M/s K.K, Mahajan Construction Pvt. Ltd.
4. Department of Fisheries, Government of Himachal Pradesh
5. Collector, Kullu Tehsil and Distt. H.P.
6. Himachal Pradesh Pollution Control Board
7. Deputy Commissioner
8. Himachal Pradesh Forest Department

....Respondent

**REJOINDER ON BEHALF OF APPLICANT TO THE
COUNTER-AFFIDAVIT BY RESPONDENT NO. 2, 5, 6,**

7 & 8



I, Kushal Gupta, Son of Shri Mohan Lal Gupta, aged about 38 years, resident of Village and Post Office Haripur, Tehsil Malai, District Kullu, Himachal Pradesh 175136, do hereby solemnly affirm and sincerely state as under:

1. That I am the APPLICANT in the present Original Application, and familiar with the facts and

circumstances of the case. As such, I am competent to swear the present Affidavit.

2. The present Rejoinder is being filed in response to the Counter Affidavit filed by Respondent No. 2, 5, 6, 7 & 8 (herein after collectively mentioned as "Respondents"). The facts leading to the present rejoinder are mentioned in the Original Application, and are not being re-iterated for the sake of brevity. The facts and circumstances described in the Original Application may be read as a part of the present Rejoinder.
3. At the outset, it is submitted that all the facts, contentions, averments of Respondents, to extent to it is not a part of the record, are denied. No part of the Respondents' submissions may be deemed to be admitted by the APPLICANT, merely for the lack of traverse.
4. Briefly, the applicant is a resident of District Kullu, Himachal Pradesh and a responsible citizen of this Country having a strong affinity towards the environmental hazard which had caused due to illegal dumping or releasing of debris, mucks, cement, silt and other chemicals used during the excavation and construction of bridge near and around the streams/ Haripur Nulla, on Kullu Manali left bank road, Himachal Pradesh. The applicant has suffered a huge damage due to the said act as the applicant has Trout Fish Farm about 50 meters downstream to the Haripur Nulla and the water of the stream is the source of fresh water to the species growing in Trout Fish Farm. The Respondents no. 2 and 3 did not comply with the norms as prescribed by the Himachal Pradesh Pollution



Control Board for dumping of debris, muck etc. during the construction of of R.C.C. T-Beam bridge of 15.75 mtr. Span alongside old bridge over Haripur Nalla under (CRF).

**Rejoinder to Counter-Affidavit of Respondent No.2,
HIMACHAL PRADESH PUBLIC WORKS
DEPARTMENT:**

1. That, the respondent's objection on the ground of want of knowledge in para no. 5 is unfounded and lacks of merit, as the claim is based on available information as the location of the Farm has been submitted in **Annexure No.1.**
2. That, para no. 6 being factual information needs no reply.
3. That, content of para 7 are factual in nature hence, requires no reply.
4. That, content of para 8 are denied on the grounds of want of knowledge. The respondent herein has made vague claims regarding the separate dumping site, or conscious dumping of debris into the Nallah, since no sufficient information or evidence to substantiate the claim has been submitted. Whereas, the muddy water that came from the construction site of the bridge in Haripur Nullah that led to death of several lakh fishes and eggs has picture evidences. Copies of the pictures showing the damage caused in the Trout farm are attached herein under **Annexure No. 2.**
5. The content of paragraph 9 are hereby denied on the grounds of being frivolous and condescending. The statements therein amount to an admission of



neglect by the respondent themselves. This clearly indicates that they were aware of the potential repercussions of their unsupervised dumping, which posed a risk to the fish farm located just 50 meters from the site. The applicant had predicted such damage and, in adherence to proper procedures, issued a legal notice on 10.05.2018, warning the respondent of the consequences. The Deputy Commissioner of Kullu acknowledged this concern and took appropriate action by notifying the contractors through a communication letter dated 01.06.2018. Despite these warnings, the negligent respondent, exhibiting arrogance, chose to disregard the essential suggestions and recommendations put forth by both the applicant and the legal authority. Copy of legal notice is filed herein under **Annexure No. 3**.

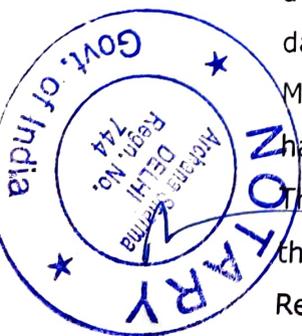
6. The content of paragraph 11 are denied on the grounds of being dismissive in nature. In this regard, the applicant, along with the Deputy Commissioner of Kullu, Director cum Warden of Fisheries, HP, Deputy Commissioner Kullu, Divisional Forest Officer, Kullu, and Pollution Control Board, Kullu, have stated that despite several requests, KK Mahajan Construction Company (Respondent No. 3) continued to dump debris and muck into the stream/Haripur Nullah. This act is polluting the water that flows towards the applicant's Trout Farm and Hatchery, located only 50 meters away, resulting in significant damage to eggs and fish. The respondent clearly failed to understand the consequences of their negligence.



5

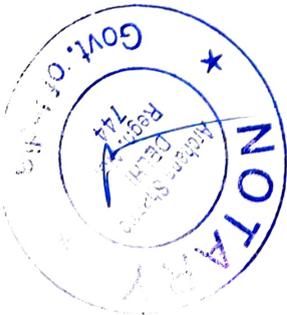
This failure to acknowledge the gravity of the situation has caused considerable harm to the applicant's operations. Copy of Map of Haripur stream and nearby areas is filled herein under **Annexure No. 4.**

7. The content of para no 12-14 are falsely acclaimed and hence, denied. It is submitted that despite legal notices, several requests and complaints by the applicant on the basis of representation dated 15.3.2019, office of Deputy Commissioner, Kullu, sent a communication letter dated 22.3.2019 (wrongly mentioned as 22.3.2018) to Sub Divisional Officer, Manali and Respondent no. 4 to enquire into the matter. Similarly, Divisional Forest Officer, Kullu sent a communication dated 16.03.2019 to Range Officer Naggar, Kullu, and Regional Officer, Pollution Control Board sent a communication dated 20.03.2019 to Respondent no. 2 to look into the matter personally, however, Respondent no.3 never ceased to dump debris and muck in the stream/Haripur Nallah and the impact of which could be seen on the Trout Farm which is just 50 m away from the construction site. This severe damage could have been easily prevent if K.K. Mahajan Construction Company/ Respondent No.3 had paid attention to the notices served to them. The Applicant had already suffered a loss of more than 60 lacs due to the abovesaid illegal act of the Respondent no.2 which has damaged the eggs and killed the fishes of the Applicant's Trout Farm. Copy of legal notices and complaints dated 22.3.2018,



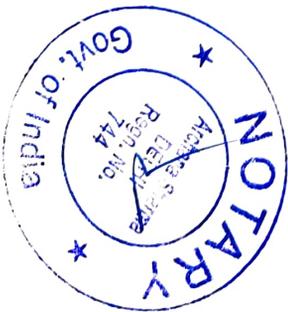
16.03.2019 and 20.03.2019 are filed herein under **Annexure No. 5 (Colly)**.

8. The content of para 15 are expressly denied as they undermine the powers of the esteemed office of Gram Panchayat Soyol. The office is very well equipped by the jurisdictional responsibility to manage solid waste and checking illegal dumping within their jurisdiction, with the authority to levy fines on individuals or organisations who litter or cause harm to the environment. Therefore, the contention of respondent holds no validity. The report dated 19.03.2019 of Gram Panchayat Soyol by the committee formed on 11.03.2019 for inspection of Trout Farm stating the number of fishes and eggs damaged due to muck, debris etc. flowing into the Nallah and into Himalayan Trout Farm due to construction work of bridge is valid. Copy of report dated 19.03.2019 of Gram Panchayat Soyol is filed herein under **Annexure No. 6**.
9. The content of para 16 and 17 are false and hence, denied. The construction caused in the Trout Farm of the Applicant was not miniscule anyone from there naked eyes could see that the contamination of water by silt, muck, debris and dust coming in water, the source of which was the construction site of the bridge has caused a large amount of fishes and water organisms' death. The competent authority of Deputy Director of Fisheries, Patlikuhal, Dist. Kullu inspected the trout farm to assess the damage caused and gave a detailed report where it is specifically mentioned that the excavated dust,



silt, muck etc. dumped directly into the Haripur Nallah choked the species of fishes and prevented their gills from absorbing enough oxygen from the water. Copy of the report dated 16.03.2019 of Deputy Director of Fisheries, Patlikuhai, Dist. Kullu is filed herein under as **Annexure No. 7**.

10. A indistinguishable report was also given by Village Revenue Officer, Patwar circle, Bardhai on 12.03.2019, copy of which is herein filed under **Annexure No. 8**.
11. The content of para 18 are denied. The sale rate of Trout Fish dropped from Rs. 500/- per Kg to Rs. 450/- per Kg due to communication letter dated 17.02.2018, with immediate effect by the Fisheries Department, this led to damages and loss to the tune of Rs.47,14,000/- (Rupees Forty Seven lakhs fourteen thousand only) to the Applicant based on the said fixed rates and report dated 16.03.2019 of Deputy Director of Fisheries, Patlikuhai, Dist. Kullu. This sudden drop in price is due to the illegal dumping of muck etc. in the water of Haripur Nullah. Copy of damages assessment report of Himalayan Trout Fish Farm and communication letter dated 17.2.2018 are filed herein under as **Annexure No. 9 (Colly)**.
12. The contentions produced in para no 19 are misinterpreted hence, denied. The damage caused by the act of Respondent is of such an exorbitant extent that the loss of the applicant attracted the attention of various newspapers and reporters. The newspapers like Punjab Kesari (16.3.2019), Divya Himachal (16.3.2019), Amar Ujala, (16.3.2019),



Dainik Jagran (16.3.2019) and The Tribune (18.3.2019), covered the incident regarding death of thousands of trout fish at applicant's trout farm and damage of fish eggs in Lakhs. Copies of all these news items published in various newspapers are filed herein under as **Annexure No 10 (Colly.)**.

13. The content mentioned in para 20 are denied. The Applicant preferred a Writ Petition (Civil) No. 1566 of 2020 on 16.03.2020, before the Hon'ble High Court of Himachal Pradesh at Shimla for damages of Rs. 47,14,000/- along with interest at the rate of 18% per annum. Copy of Writ Petition (Civil) No. 1566 of 2020 is filed herein under as **Annexure No 11**.

14. That para 21 of the application is also matter of record. Hence needs no comments.

15. That para 22 of the application is also matter of record. Hence needs no comments.

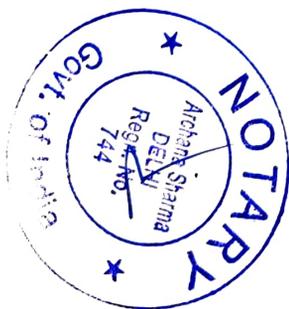
16. That content of para 23 are denied. It is submitted that he Hon'ble High court vide order dated 14.09.2020 was dismissed as withdrawn with the liberty to file appropriate proceedings before appropriate court of law. It was also stated therein that the period spent during the pendency of the Writ Petition shall not be counted towards limitation in filing appropriate proceedings. Copy of order dated 14.09.2020 is filed herein under as **Annexure No. 12**.

17. The content in para 24 are being denied on the grounds of being frivolous and concocted. It is a material fact the applicant has suffered a huge



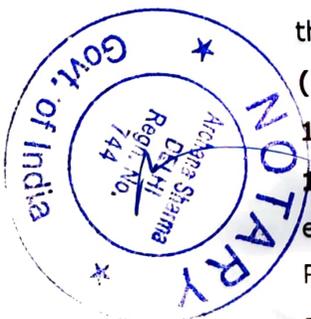
monetary loss due to the ill acts of the respondents. The lack of acknowledgement of the Respondents even after numerous legal notices and communication letter has led to not just monetary loss but also has affected the delicate harmony between of the nature and its ecological balance. The nonchalant dumping ceased the lives of uncountable number of living organisms in water and contaminated the water of the Haripur Nullah for the people dependant on it as well. Therefore, the respondents must be held accountable for their misdeeds.

18. That the content of para 25 of the application is false and frivolous in nature. Ther applicant not only predicted the damages to be caused by the project, not only suggested and requested measures to control the harm by legal notices. The applicant filed various complaints against the Respondents regarding the construction activities in relevant authorities. Therefore, it is a baseless claim to allege that no complaints were filled by the applicant. The content of this para are clear evidence of arrogance of the respondent and portrays their nonchalant behaviour and unaccountability towards environment.
19. The content mentioned in para 26 are wrong, false hence, denied. It is pertinent to note that illegal dumping of debris, muck, silt and dust in Haripur Nullah by Respondent no 2 and have attracted the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and even violated the directions of the Director cum Warden



Fisheries, Deputy Commissioner Kullu, Divisional Forest Officer, Kullu and Pollution Control Board, Kullu.

20. The content of para 27 are expressly denied. The unlawful, unregulated dumping by Respondent No 2 & 3 into the Haripur Nullah has led to violation of section 24 of the Water (Prevention and Control of Pollution) Act, 1974.
21. That para 28 of the application is wrong not admitted to be correct hence denied. The Respondent no. 3 dumped the debris and mucks etc. excavated for construction of bridge or other waste chemicals used for construction of the bridge into and around the stream/ Haripur Nulla, raising toxicity in the water body making the water pollutant and unfit for the life the fishes and eggs. The discharge of untreated effluent is grave violation of Section 24 of the Water (Prevention and Control of Pollution) Act, 1974.
22. That para 29 of the application is wrong not admitted to be correct hence denied. Respondent No. 3, a major construction contractor, has been identified as the primary polluter of Haripur Nulla by unlawfully discharging waste into its waters, thereby violating the provisions of the **Water (Prevention and Control of Pollution) Act, 1974** and **Environment (Protection) Rules, 1986**. Notwithstanding these violations, no enforcement action has been taken against Respondent No. 3, nor have the damages amounting to Rs. 47,14,000/- been considered by the Respondents.



23. That para 30 is false in nature. It is submitted that Respondent No. 3 has violated Section 24 of the **Water (Prevention and Control of Pollution) Act, 1974**, and as per Section 43 of the Act, the penalty should include imprisonment, not just environmental compensation. Section 43 mandates imprisonment for a term not less than 1.5 years, extending up to 6 years, along with a fine.
24. That content of para 31 of the application is wrong not admitted to be correct hence denied. It is submitted that due to the severe violations by Respondent No. 3 of the **Water (Prevention and Control of Pollution) Act, 1974** and **Environment (Protection) Rules, 1986**, payment of environmental compensation alone is insufficient, as the environmental damage caused is irreparable and irreversible.

**Rejoinder to Counter-Affidavit of Respondent No.5 & 7,
COLLECTOR -CUM- DEPUTY COMMISSIONER KULLU,
DISTRICT KULLU, HP.**

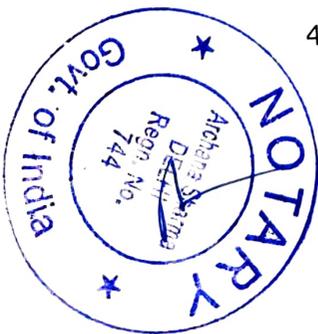
REPLY ON MERITS-

25. That para 1 of the counter affidavit needs no reply.
26. That, para no. 2 of the application being formal in nature, needs no reply.
27. That, para no. 3 of the application needs no reply from the replying respondent.
28. That, para no. 8 pertains to respondent no 2 and 3 and hence, needs no reply.
29. That, para no. 4 of the application being formal in nature needs no reply.



REPLY TO THE FACTS OF THE COUNTER-AFFIDAVIT-

30. That, para 1 of the counter-affidavit needs no reply.
31. That, para 2 of the counter-affidavit needs no reply.
32. That, para 3 of the counter-affidavit needs no reply.
33. That, para 4 of the counter-affidavit needs no reply.
34. That, the respondent's objection on the ground of want of knowledge in para no. 5 is unfounded and lacks of merit, as the claim is based on available information as the location of the Farm has been submitted in **Annexure No.1.**
35. That, content of para 6 need no reply.
36. That, content of para 7 are unfounded on the grounds of lack of knowledge as the claim is based on the available information of the Trout Farm.
37. That, content of para 8 needs no reply.
38. That, content of para 9 are factual knowledge hence, requires no reply.
39. That, the content of para 10 requires no reply.
40. That, the content of para 11 need no reply.
41. That, the content of para 12 requires no reply
42. That, the content of para 13 are denied, That, despite the legal notice and complaints by the Applicant, neither the action was taken against the polluter nor any towards the grievances of the Applicant. Thereafter, Applicant gave the representations to the Director cum Warden Fisheries, HP, Deputy Commissioner Kullu,



Divisional Forest Officer, Kullu and Pollution Control Board, Kullu thereby stating that despite the several requests, KK Mahajan Construction Company/ Respondent no. 3 was dumping debris and muck in the stream/ Haripur Nullah which is polluting the water running towards the Trout Farm and Hatchery of the Applicant causing damages to eggs and fishes. By then the Applicant had already suffered a loss of more than 60 lacs due to the abovesaid illegal act of the Respondent no. 2 which has damaged the eggs and killed the fishes of the Applicant's Trout Farm. Copies of the representations dated 15.03.2019 are attached herein under **Annexure No 13.**

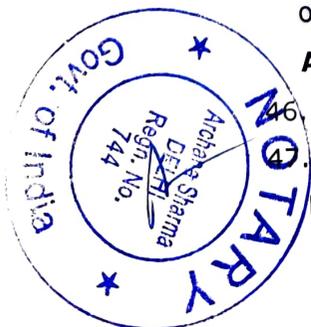
43. That, the content of para 14 needs no reply.

44. That, the content of para 15 needs no reply.

45. That, the content of para 16 is denied. The damage to the Applicant's Trout Farm was evident, with contamination from silt, muck, and debris from the bridge construction site causing mass fish deaths. The Deputy Director of Fisheries, Patlikuh, inspected the farm and confirmed that the dumped material obstructed fish gills, preventing oxygen absorption. Therefore, the damage is evident and the expert opinion has been already delivered. Copy of Deputy Director of Fisheries is attached herein in **Annexure No. 14.**

46. That, the content of para 17 need no reply.

47. That, the content of para 18 and 24 is denied. The Fisheries Department reduced the sale rate of Trout Fish from Rs. 500/kg to Rs. 450/kg through a communication letter dated 17.02.2018, effective

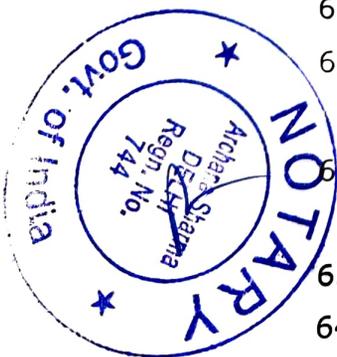


immediately. As per the Deputy Director of Fisheries' assessment report dated 16.03.2019, the Applicant has suffered a loss of Rs. 47,14,000/- due to the illegal dumping of muck in Haripur Nullah, which caused significant damage to the farm. Copy of communication letter dated 17.02.2018 is attached herein under **Annexure No. 15.**

48. That, the content of para 19 need no reply.
49. That, the content of para 20 need no reply.
50. That, the content of para 21 need no reply.
51. That, the content of para 22 need no reply.
52. That, the content of para 23 need no reply.
53. That, the content of para 25 need no reply.
54. That, the content of para 26 need no reply.
55. That, the content of para 27 need no reply.
56. That, the content of para 28 need no reply.
57. That, the content of para 29 need no reply.
58. That, the content of para 30 need no reply.
59. That, the content of para 31 need no reply.

**Rejoinder to Counter-Affidavit of Respondent No. 6,
Himachal Pradesh State Pollution Control Board.**

60. That, the content of para 1-2 require no reply.
61. That, content of para 3-4 are matter of record, hence no reply needed.
62. That, content of 5-7 are matter of record hence, no reply needed.
63. That, content of para 8 require no reply.
64. That, content of para 9-11 require no reply.
65. That, content of para 12 require no reply.



66. That, the content of paragraphs 13-14 are denied as incomplete. Once the information regarding the polluter was provided, it became the responsibility of Respondent No. 6's office to take cognizance and conduct regular follow-ups to monitor the status and determine if the alleged pollution had ceased, as well as whether appropriate actions were being taken to reverse the damage. Merely waiting for a response and performing only the preliminary formalities cannot be considered as fulfilling their duty properly.

67. That, the content of para 15-18 require no reply.

68. That, the content of para 19-23 require no reply.

69. That, the content of para 24-26 require no reply.

70. That, the content of para 27 require no reply.

71. That, the content of para 28-29 are denied as incomplete. Once the information regarding the polluter was provided, it was the responsibility of the **Regional Office** to take cognizance and conduct regular follow-ups to assess whether the alleged pollution had ceased and whether appropriate measures were being taken to address the damage caused. Simply sending a letter to **HPPWD** and waiting for a response without any proactive action beyond preliminary formalities cannot be deemed as fulfilling their duty adequately.

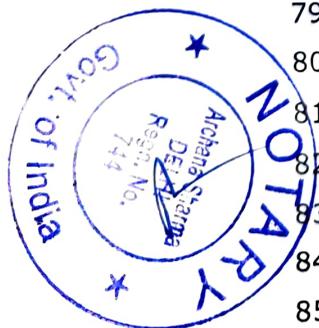
72. That, the content if para 30-31 requires no reply.

**Rejoinder to Counter-Affidavit to Respondent No. 8,
Himachal Pradesh Forest Department-**

Preliminary Submissions-



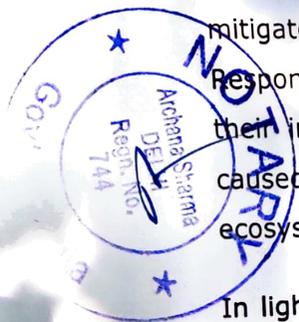
73. That, the content of para 1 are denied, as the application filed by the Applicant stands maintainable.
74. That, the content of para 2 are denied on the grounds of being ambiguous and incomplete.
75. That, the content of para 5 are devoid of validity since the exact locations of the farm from Haripur Nallah is produced as submission herein under **Annexure no. 1.**
76. That, the content of para 6 require no reply.
77. That, the content of para 7 is denied. For the operation of the Trout farm, the Applicant utilizes a nearby creek, where water flows downstream by gravity into the tanks and is subsequently returned to the creek, maintaining a natural, fresh-water habitat with balanced pH levels and dissolved oxygen for the Trout fish. In 2018, the Applicant had 80,000 one-year-old rainbow trout, 70,000 two-year-old rainbow trout, 40,000 three-year-old rainbow trout, 15,000 breeder rainbow trout aged 6-7 years, 5,600 six-year-old brown trout, and 580 five-year-old Carp fish.
78. That, the content of para 8 requires no reply.
79. That, the content of para 9 requires no reply.
80. That, the content of para 10 needs no reply.
81. That, the content of para 11 needs no reply.
82. That, the content of para 12 requires no reply.
83. That, the content of para 13 is matter of fact.
84. That, the content of para 21 requires no reply.
85. The contents of paragraph 22 are false. All the Respondents are parties to the original application.



86. That, the contents of para 23 are false. The suit is now present before the Hon'ble National Green Tribunal("NGT") by an Ordinary Application.
87. That, the contents of para 24 are false. Although the bridge is being constructed in public interest, the constructors must pay utmost attention to the nearby environment in order to cause minimum damage with maximum restoration.
88. That, the contents of para no 25 does not require reply.
89. That, the contents of para 26 are denied on the grounds of being inconsistent, incomplete and vague.

It is humbly submitted that the Respondents have acted with gross negligence and indifference, thereby failing to discharge their duties in a diligent and responsible manner. The construction of the bridge on Haripur Nallah, coupled with the unlawful pollution of the watercourse, has resulted in significant environmental harm, culminating in the death of lakhs of fish and eggs in the Applicant's Trout Farm. Despite the knowledge of such destructive activities, the Respondents have failed to take timely and effective action to prevent or mitigate the adverse effects of the pollution. The Respondents' failure to address the pollution, coupled with their inaction, has directly led to the irreversible damage caused to the Applicant's business and the surrounding ecosystem.

In light of the aforementioned facts, it is humbly requested that the Respondents be held accountable for their misdeeds and be directed to compensate the Applicant for the damages



suffered, amounting to Rs. 47,14,000/- (Rupees Forty-Seven Lakhs Fourteen Thousand only). Furthermore, it is imperative that the Respondents take immediate and necessary steps to reverse the damage caused to the environment, restore the ecological balance, and ensure that no further harm is inflicted upon the delicate aquatic ecosystem of Haripur Nallah. It is essential that appropriate measures are taken to prevent future occurrences of such unlawful and reckless actions, thereby safeguarding both the environment and the Applicant's interests.

Identify the deponent who has Stated/put T.I. In my presence

VERIFICATION

17 APR 2025

Verified at _____ on this ___ day of April, 2025
 that the contents of the above affidavit are true and correct to the best of my knowledge and no part of it is false, and nothing material has been concealed therein.

[Signature]
 DEPONENT



[Signature]
 Certified that the foregoing statement was declared or admission/affirmation before me which has been read over to the deponent who has admitted

It is Correct

[Signature]
 Notary DELHI

17 APR 2025

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

SITTING AT NEW DELHI

ORIGINAL APPLICATION NO. 383 OF 2024

IN THE MATTER OF:

KUSHAL GUPTA

...APPLICANT

VERSUS

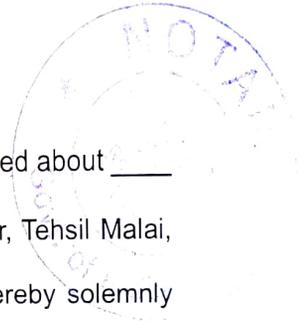
STATE OF HIMACHAL PRADESH AND OTHERS.

...RESPONDENTS

AFFIDAVIT

I, Kushal Gupta, Son of Shri Mohan Lal Gupta, aged about _____
years, resident of Village and Post Office Haripur, Tehsil Malai,
District Kullu, Himachal Pradesh- 175136, do hereby solemnly
affirm and declare as under: -

1. That I am applicant and as such I am conversant with the facts of the case and thus competent to affirm this affidavit.
2. That I have read the contents of the accompanying original application including facts in brief etc. from pages 1 to 18 and have understood the same.
3. That the facts stated therein are true and correct to the best of my knowledge and belief and nothing material has been suppressed.



- 4. That I have instructed by Advocate and the Application has been prepared by my Advocate on my instructions are stated above.
- 5. That the annexures are true copies of their respective originals.

R Gupta
DEPONENT

VERIFICATION

I above named deponent do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed there from

Identify the deponent who has Signed/out T.J. in my presence

Verified at 1.7 APR 2025 on day of April ~~March~~ 2025
2024
17 APR 2025

R Gupta
DEPONENT



Certified that the foregoing statement was declared or solemn affirmation before me which has been read over to the deponent who has admitted

It as Correct *A* Notary DELHI

17 APR 2025



Rana Bussa <ranabussaoffice@gmail.com>

Rejoinder in OA No.383/2024 titled " Kushal Gupta Vs State of Himachal Pradesh & Ors"
before NGT Principal Bench Delhi

2 messages

Rana Bussa <ranabussaoffice@gmail.com>

To: <tcp-hp@nic.in>, <pwdsecy-hp@nic.in>, <fisheriessecy-hp@nic.in>, chairmanpcbhp@gmail.com
<chairmanpcbhp@gmail.com>, <dc-kul-hp@nic.in>, <forestsecy-hp@nic.in>

Thu, 17 Apr at 11:37

Sir,
Kindly take note, the Petitioner is filing his Rejoinder before Hon'ble NGT, Principal Bench Delhi in OA No.383/2024 titled " KushalGupta Vs State of Himachal Pradesh & Ors"

Copy of the Rejoinder is annexed here with.

Thanks & Regards

Rana Sandeep Bussa Advocate

supreme court of India

office Address:

Flat no.62, Tower No.14, Supreme Enclave,

Mayur Vihar Phase 1

New Delhi -91

Mob. 9990829608

Email id-ranabussaoffice@gmail.com ranabussa@gmail.com

On Sat, 31 Aug 2024 at 16:15, Rana Bussa <ranabussaoffice@gmail.com> wrote:

Sir,

Kindly take note, that the Hon'ble NGT, Principal Bench Delhi was pleased to issue Notice in OA No.383/2024 titled, " Kushal Gupta Vs State of Himachal Pradesh & Ors" vide order dated 02.08.2024.

Please take note that the next date of hearing in OA No.383/2024 titled " Kushal Gupta Vs State of Himachal Pradesh & Ors" is listed on 13.11.2024 before NGT, Principal Bench, Delhi.

Thanks & Regards

Rana Sandeep Bussa Advocate

supreme court of India

office Address:

Flat no.62, Tower No.14, Supreme Enclave,

Mayur Vihar Phase 1

New Delhi -91

Mob. 9990829608

Email id-ranabussaoffice@gmail.com ranabussa@gmail.com

Enclosed herewith:

- 1) Scan Copy of the Original Application No.383/2024,
- 2) Order dated 02.08.2024

rejoinder Kushal Gupta...pdf

na Bussa <ranabussaoffice@gmail.com>
to: Raj kumar <rajkumarhighcourt@gmail.com>
[Quoted text hidden]
rejoinder Kushal Gupta...pdf

Thu, 17 Apr at 11:38