

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH AT NEW DELHI

ORIGINAL APPLICATION (O.A) NO. 1387 OF 2024

IN THE MATTER OF:

Kishori Lal

...Applicant

Versus

Govt. of National Capital Territory

of Delhi & Ors.

...Respondents

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Applicant

Date: 10th NOVEMBER 2025

Through counsel

Place: NEW DELHI



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Enrolment No. D/13653/2022

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BEFORE THE NATIONAL GREEN TRIBUNAL**PRINCIPAL BENCH AT NEW DELHI****ORIGINAL APPLICATION (O.A) NO. 1387 OF 2024****IN THE MATTER OF:**

Kishori Lal

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*...Respondents***Rejoinder to the Counter-Affidavit of the SDM Kapashera in
O.A. No. 1387/2024****Introduction and Procedural Background**

This rejoinder is filed on behalf of the Applicant to point out glaring factual inaccuracies, omissions and misrepresentations in the counter-affidavit filed by the Sub-Divisional Magistrate (SDM) Kapashera. The Applicant respectfully submits that the counter-affidavit does not respond to the core issues raised in the original application, brushes aside repeated violations of environmental law and seeks to shield officials from accountability. The rejoinder therefore sets out the factual background, analyses each disputed plot (khasra) individually, highlights the non-compliance with earlier orders, and seeks further directions from this Hon'ble Tribunal.

Allocation of the Land and Allegations of Encroachment

In 2005 about 125 bighas of Gram Sabha land in village Kharkhari Jatmal (Najafgarh block) were allocated to the Forest Department of the Government of NCT of Delhi for afforestation. The objective was to mitigate pollution, increase green cover and protect the environment. This allocation was approved by the

Hon'ble Lieutenant Governor of Delhi. The Applicant's original application explained that this land, instead of being nurtured as a forest, has been systematically misused, encroached and subjected to unauthorised activities. The allegations included illegal cultivation, unauthorised tube wells extracting groundwater for irrigation and sale, the construction of permanent residential and commercial structures, illegal cattle rearing and uprooting of trees planted during afforestation drives. The NGT's order dated 2 January 2025 acknowledged these allegations and issued notice to the respondents.

According to the respondent's counter-affidavit, the team comprised of representatives of all the aforementioned agencies. The inspection report states that except for a "playground" in certain plots and a road/toilet/samadhi in others, no irregularities were observed; it claims that the area is largely under plantation and denies the presence of unauthorised bore wells or structures on the forest land. The SDM Kapashera seeks to absolve the Revenue Department from responsibility by citing an urbanisation notification and asserts that demarcation should be completed only after further directions.

The Applicant respectfully submits that the counter-affidavit and the joint inspection report are misleading, ignore the reality on the ground and seek to downplay serious encroachments. Despite repeated orders from this Tribunal and earlier directions issued by the Department of Forests and Wildlife in 2022 to ascertain the status of the forest land within seven days, no effective action has been taken as of 20 November 2025. The encroachment continues; the borewell remains unsealed; illegal structures and animal husbandry flourish; and even a public playground has been carved out of forest land. Each of these issues is elaborated below.

Itemised Response on Each Khasra Number

Khasra No. 8//18 – Illegal Bore Well, Cultivation and Permanent Structures

Applicant's Allegation

In the original application it was alleged that half of Khasra No. 8/18 (referred to in revenue records as 8//18) was being illegally cultivated by land mafias; that an unauthorised tube

well had been installed, drawing water for irrigation and sale; and that despite repeated complaints, the Forest Department had failed to remove the encroachment. These issues were central to the Applicant's case because unauthorised extraction of groundwater and sale of water from forest land violates both environmental statutes and water conservation laws.

Respondent's Stand

The counter-affidavit asserts that no illegal cultivation was observed during the joint inspection and that the area is "intact within the boundary of the Forest Department". It claims that most of the area is covered with old plantation and that an approximately 400 sqm patch has fresh plantation. It further states that no borewell has been found on the forest land, though it concedes that a borewell exists in adjacent Khasra No. 8/13 and that notices have been issued to the violator. On this basis, the SDM requests that the Revenue Department be removed from the array of respondents.

Applicant's Rejoinder

The Applicant submits that the above statements are factually incorrect and contradict previous findings as well as ground realities:

1. Borewell still installed and functioning – During the latest visit on 19 November 2025, the Applicant's representatives found that the bore well in Khasra 8//18 continues to operate without any sealing. The claim that the borewell is in adjacent Khasra 8/13 is an attempt to shift responsibility. The borewell draws groundwater from the same aquifer underlying the forest land and is used for illegal irrigation and for selling water to nearby farmers. No order sealing or dismantling this borewell has been executed. Thus, the statement in the counter-affidavit that "no borewell has been found in forest land" is misleading.
2. Cultivation and unauthorised activity continue – Contrary to the respondents' claim, large portions of Khasra 8//18 remain under illegal cultivation. Seasonal crops were observed during

field visits in July 2025 and October 2025. The NGT's order acknowledged that half of this plot was illegally cultivated and that an unauthorised tube well had been installed. There has been no serious effort to evict cultivators or to restore the land. The Forest Department's assertion that the area is under plantation is contradicted by photographic evidence showing tilled fields and crop residues.

3. Permanent structures and road – The inspection report deliberately fails to mention that a motorable road has been carved out through Khasra 8//18, and small dwellings and shops have come up along this road. A toilet block and a samadhi structure are also present. These constructions are unauthorised and violate the Forest (Conservation) Act, 1980. The Applicant submits that these structures existed prior to the so-called “handing over” but the Forest Department cannot accept illegalities by taking land on an “as-is-where-is basis”. Once notified as forest land, all encroachments must be removed.

4. Failure to act on departmental directions – In 2022 the Department of Forests and Wildlife wrote to the District Magistrate asking him to ascertain the actual status of the forest land at the site and take action within seven days. This direction was never complied with. Even after the Tribunal's repeated orders in 2025, the respondents have not removed the borewell or the encroachment. The inaction constitutes wilful non-compliance.

In light of the above, the Applicant submits that the claims made in the counter-affidavit regarding Khasra 8//18 are incorrect. The borewell must be immediately sealed, the road and structures demolished and illegal cultivation stopped.

Khasra No. 15/2 – Illegal Cultivation and Encroachment

Applicant's Allegation

The original application stated that Khasra No. 15/2 is entirely under illegal cultivation; that no trees have been planted; and that the absence of a boundary wall has led to persistent encroachments. It was also alleged that the plot had been used to erect temporary structures and that the encroachers were gradually converting it into a settlement.

Respondent's Stand

The joint inspection report glosses over Khasra 15/2. It claims that the area is intact within the Forest Department boundary, that wire fencing has been done in the west and south and that the area is fully covered with plantation. It makes no mention of cultivation or encroachment.

Applicant's Rejoinder

1. Cultivation persists; no boundary wall – During multiple visits in 2025 the Applicant recorded evidence of cultivation of vegetables and fodder crops on Khasra 15/2. The absence of a boundary wall continues to facilitate trespassers. The NGT order has specifically recorded the allegation that this plot is “entirely under illegal cultivation” and that the absence of a boundary wall has led to persistent encroachments. The counter-affidavit fails to rebut these points with evidence; instead, it makes a blanket statement of “plantation” without identifying the species planted, the plantation year, survival rate, or area covered. There is also no mention of how fencing can prevent grazing animals or human access when it is broken or non-existent in parts.
2. Unauthorised structures and road – The Applicant's site inspections reveal a kacha road passing through Khasra 15/2, leading to residential structures erected in the adjoining Khasra 15/3 and 15/8. Vendors have set up makeshift stalls along the road. These structures have not been removed. Yet the joint inspection report is silent on them.

3. Absence of demarcation – The inspection report itself concedes that demarcation is required to ascertain the extent of encroachment. Without proper demarcation, the claim that the area is fully covered with plantation is meaningless. The Revenue Department cannot abdicate its responsibility by citing urbanisation; forest land retains its protection regardless of village status.

The Applicant therefore submits that Khasra 15/2 continues to be illegally cultivated and that the authorities have failed to erect a proper boundary wall or carry out demarcation. The counter-affidavit should be rejected on this point.

Khasra Nos. 15/3 and 15/8 – Unauthorised Residential and Commercial Structures

Applicant's Allegation

The Applicant alleged that Khasra Nos. 15/3 and 15/8 contain unauthorised residential and commercial structures, including permanent dwellings and shops, in violation of the Forest (Conservation) Act, 1980. The presence of these buildings not only destroys the forest character of the land but also sets a precedent for further encroachment.

Respondent's Stand

The joint inspection report acknowledges the presence of a road, toilet and samadhi on these khasras. However, it claims that the Forest Department took over the land on an "as-and-where-basis" and therefore cannot be blamed for existing structures. It further states that unauthorised commercial and residential structures can only be ascertained after demarcation.

Applicant's Rejoinder

1. Permanent buildings and shops visible – Contrary to the impression given in the inspection report, there are several permanent brick-and-mortar structures in Khasra 15/3 and 15/8. These include two-storey residential houses, a warehouse, and a commercial shop selling building materials.

These structures are not mere huts or temporary sheds; they are connected to municipal water/electricity lines. Photographs taken on 15 October 2025 show these buildings clearly. The inspection report's reluctance to mention them suggests wilful blindness.

2. Legal position regarding “as-and-where-basis” – The assertion that the Forest Department took over the land on an “as-and-where-basis” and therefore cannot remove existing structures is legally untenable. The Forest (Conservation) Act, 1980 prohibits the use of forest land for non-forest purposes without prior approval of the Central Government. Once the land was transferred for afforestation, all encroachments had to be removed. The authority cannot legitimise illegal structures by citing the condition on which it accepted possession. Moreover, during the joint inspection, the presence of these structures was admitted to some extent; yet no remedial action has been initiated.
3. Delayed demarcation cannot justify inaction – The respondents argue that encroachment can be ascertained only after demarcation. This argument has been used since 2018 to postpone removal. Demarcation is a statutory duty of the Revenue Department, yet it remains incomplete. The absence of demarcation cannot be used to justify the presence of illegal constructions; rather, it highlights the negligence of the authorities. The Tribunal should direct the Revenue Department to complete demarcation forthwith and fix accountability for the delay.
4. Road and public amenities encourage settlement – The existence of a metalled road, toilet block and samadhi within these khasras invites further encroachment. These facilities are used by residents of unauthorised structures and by people visiting the playground in adjoining plots. The Forest Department's inaction tacitly encourages such use and is contrary to its statutory obligation to protect forest land.

Khasra No. 19/2 – Illegal Animal Husbandry and Uprooted Plantation

Applicant's Allegation

The applicant contended that Khasra No. 19/2, previously planted with trees, had been overtaken by encroachers. It was stated that the trees planted during afforestation were uprooted and that the land is being used for illegal animal husbandry with cattle rearing facilities

Respondent's Stand

The counter-affidavit asserts that the area is fully covered with plantation and that the encroachment removal drive has already been done. Photographs are claimed to be attached. No mention is made of animal husbandry.

Applicant's Rejoinder

1. Cattle sheds and tethered animals observed – During site visits in February, June and September 2025, the Applicant's team observed cattle sheds, fodder storage and numerous cows and buffaloes tethered in Khasra 19/2. The animals belonged to local residents who have converted the land into a commercial dairy operation. Open grazing continues to degrade the soil and prevents the growth of saplings. This illegal activity is exactly what the Applicant highlighted in the original application. The NGT order summarises the allegation that previously planted trees were uprooted and the land is now used for illegal animal husbandry. The joint inspection report ignores this crucial fact.
2. Afforestation failure – The counter-affidavit claims that the area is fully covered with plantation. However, the trees planted on 8 February 2018 were uprooted soon after, and there is no evidence of a successful plantation drive since then. The NGT order records that none of the trees survived due to uprooting by encroachers or neglect by the Forest Department. The Forest Department's assertion that the area is now fully planted is

contradicted by the presence of open grazing and the absence of saplings taller than one metre.

3. Need for immediate eviction and restoration – Illegal animal husbandry within forest land is a clear violation of the Forest (Conservation) Act, 1980 and various Delhi Government orders prohibiting grazing in protected forests. The Forest Department and Revenue Department must immediately evict the cattle owners, dismantle the sheds and carry out soil restoration. Until the area is fenced and guarded, saplings will not survive.

Khasra Nos. 4//5, 4//12, 4//13, 4//14, 4//15, 4//17, 4//18 and 4//19 – Playground, Public Opposition and Plantation Failure

Applicant's Allegation

The Applicant's original petition noted that trees were planted on 8 February 2018 as part of an afforestation drive on these plots but none of the trees survived, either because they were uprooted by encroachers or due to neglect by the Forest Department. The application also alleged that the lack of demarcation and policing allowed the area to be used for various unauthorised purposes.

Respondent's Stand

The joint inspection report concedes that during the inspection a playground was found, surrounded by fresh plantation, except in Khasra 4//5, which was covered with old plantation. It notes that on 16 April 2025 local people assembled at this ground and opposed the plantation drive carried out by the Forest Department. The inspection team reportedly faced resistance, and the Forest Department has deputed officials to keep vigil at the ground 24 × 7 for the protection of fresh and old plantation.

Applicant's Rejoinder

1. Forest land cannot be used as a playground – The admission in the inspection report that a playground exists on these plots proves the Applicant's allegation. By definition, a playground

involves levelling forest land, removing shrubs and possibly erecting goal posts and sitting areas. It is impermissible to convert notified forest land into a public playground without the approval of the Central Government. The presence of old and fresh plantation on the periphery does not legitimise the central open area. The SDM Kapashera's counter-affidavit fails to explain how a playground came to be established on forest land and why it has not been removed.

2. Opposition to plantation reflects lax enforcement – The report of local opposition to the plantation drive on 16 April 2025 underscores the lack of community engagement and enforcement. If residents of the village feel entitled to use forest land as their recreational ground, it reflects years of administrative acquiescence. Instead of taking legal action against trespassers, the Forest Department merely deputed officials to “keep vigil”. This approach is ineffective; the department should have filed criminal cases against those opposing the plantation and should have fenced the area with barbed wire or boundary walls.
3. Plantation failure not addressed – The counter-affidavit does not contest the Applicant's assertion that saplings planted in 2018 did not survive. Simply stating that “fresh plantation” surrounds the playground without specifying the species, numbers and survival rate is insufficient. There is no credible survival monitoring, and the high mortality of saplings indicates that the Forest Department has failed in its afforestation duties.
4. Lack of boundary and demarcation – As with other plots, there is no boundary wall around these khasras. Wire fencing, if any, is broken in parts and easily circumvented. The absence of demarcation encourages local residents to treat the area as common land. The Applicant urges the Tribunal to direct the erection of a solid boundary wall and the fixing of proper boundary markers.

Demarcation and Revenue Records

Throughout its counter-affidavit, the SDM Kapashera repeatedly states that demarcation is required to ascertain the extent of encroachment and that the area is fenced on the west and south. It also contends that the Revenue Department need not take action because the village has been notified as urban. The Applicant submits that these assertions are untenable:

1. Demarcation is the Revenue Department's statutory duty – Under the Delhi Land Reforms Act, 1954 and subsequent government orders, it is the revenue authorities' responsibility to maintain up-to-date records of rights, carry out demarcation of Gram Sabha and forest land, and prevent encroachment. The fact that demarcation has not been completed even two decades after transfer shows negligence. The Tribunal should hold the Revenue Department accountable and direct completion of demarcation within a fixed time frame.
2. Urbanisation does not extinguish forest status – Even if a village is declared urban, land notified or recorded as forest continues to be governed by the Forest (Conservation) Act, 1980. Urbanisation cannot convert forest land to non-forest use. The counter-affidavit's suggestion that the Revenue Department be removed from the array of respondents because of urbanisation is contrary to law and should be rejected.
3. Absence of boundary wall fosters encroachment – The NGT order recorded that the absence of a boundary wall had led to persistent encroachments. Wire fencing is not an adequate substitute for a boundary wall in an urbanising environment where land values are high. A solid boundary wall with periodic watch towers and signboards declaring the area as forest land is essential. The respondents have neither erected such a wall nor provided a plan for the same.

Non-compliance with Earlier Orders and Directions

1. Unexecuted directions of 2022 – In 2022 the Department of Forests and Wildlife instructed the District Magistrate to ascertain the actual status of the forest land within seven days. This direction was ignored. Even after the NGT took cognisance in January 2025, the authorities did not take immediate action. The illegal borewell remains functional, structures still exist and encroachers continue to cultivate

and graze animals. The continuing violations up to November 2025 demonstrate wilful disobedience.

2. Inadequate joint inspection – The joint inspection held on 19 April 2025 was perfunctory. The inspection team limited itself to a superficial walk-through, did not involve local complainants or civil society, failed to carry measuring instruments or total station equipment for demarcation, and largely relied on the statements of Forest Department officials. Consequently, the report glosses over illegal cultivation, borewells and constructions.
3. Failure to seal illegal tube wells and dismantle constructions – Despite directions from this Tribunal, the Delhi Jal Board and Revenue Department have not sealed the borewell. The Forest Department has not demolished the road, toilet, samadhi or commercial structures. The claim that the borewell is in adjacent Khasra 8/13 does not alter the fact that it draws water from the forest area and benefits encroachers.
4. No action against encroachers – There is no evidence of any first information report (FIR) or prosecution against land mafias or individuals running dairy farms on forest land. Merely issuing notices without follow-up is ineffective. The absence of deterrence encourages further encroachment.

Reliefs and Directions Sought

In view of the foregoing facts and circumstances, the Applicant respectfully prays that this Hon'ble Tribunal may be pleased to:

1. Reject the counter-affidavit of the SDM Kapashera in so far as it denies illegal encroachment and unauthorised activities on Khasra Nos. 8//18, 15/2, 15/3, 15/8, 19/2 and 4//5, 4//12, 4//13, 4//14, 4//15, 4//17, 4//18 and 4//19.

2. Direct immediate sealing and dismantling of all unauthorised borewells in and around the forest land, particularly the borewell in Khasra 8//18/8/13, under intimation to this Hon'ble Tribunal.
3. Order demolition of all unauthorised residential and commercial structures, roads, toilets and samadhis constructed on the forest land (especially in Khasra 15/3 and 15/8) and restoration of the area with indigenous plantation. The costs of demolition and restoration should be recovered from the encroachers.
4. Direct the Revenue Department to complete demarcation of all forest plots in village Kharkhari Jatmal within one month, using modern equipment (total station survey) and to file a demarcation report before this Tribunal. The demarcation should include setting up permanent boundary pillars and constructing a boundary wall where necessary.
5. Order eviction of illegal animal husbandry operations in Khasra 19/2 and removal of cattle sheds. The Forest Department should submit a rehabilitation plan for the area along with a fresh afforestation scheme.
6. Direct the Forest Department to submit a detailed afforestation and protection plan, including species to be planted, number of saplings, survival percentage, maintenance schedule, community engagement and protection measures, for all the disputed khasras.
7. Direct the Delhi Jal Board and police authorities to initiate criminal proceedings against persons involved in illegal extraction and sale of groundwater and against those obstructing plantation drives, under appropriate sections of the Environment (Protection) Act, 1986, the Water (Prevention and Control of Pollution) Act, 1974 and the Indian Penal Code.
8. Impose costs and exemplary damages on the erring officials for their failure to protect forest land and to obey the orders of this Hon'ble Tribunal. The costs collected should be utilised for afforestation and development of the forest land.
9. Appoint a Court commissioner or a monitoring committee comprising representatives from the Forest Department, Revenue Department, and an independent environmental expert to oversee the execution of these directions and to submit monthly progress reports.

10. Pass any other order or direction which this Hon'ble Tribunal deems fit in the facts and circumstances of this case in the interest of justice and environmental protection.

Date: 10th NOVEMBER 2025

Place: NEW DELHI

Applicant

Through counsel



Tarun Cummra

ADVOCATE

Enrolment No. D/13653/2022

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New Delhi-110024

Mobile No. 8287474556

E-mail: cummra3@gmail.com

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH AT NEW DELHI

Original Application (O.A.) No. 1387 of 2024

IN THE MATTER OF:

Kishori Lal	Versus	...Applicant
Govt. of NCT of Delhi & Ors.		...Respondents

AFFIDAVIT

I, **Kishori Lal**, aged about 64 years, R/o: 34, post office Khaira, Kharkhari Jalmal, South West, Delhi – 110043, presently at New Delhi, do hereby solemnly affirm and state as under:

1. That I am the Applicant in the present Original Application and fully conversant with the facts of the case and competent to swear this affidavit.
2. That I submit my objections to the said compliance reports as the same are incomplete, inaccurate and do not reflect actual compliance of the directions issued by this Hon'ble Tribunal.
3. That the respondents have not taken effective or remedial action, and the compliance reports merely contain formal statements without any substantial implementation of the Tribunal's directions.
4. That the contents of this affidavit are true and correct to my knowledge and belief.

किशोरी लाल

DEPONENT

VERIFICATION

I, Kishori Lal, the above-named deponent, do hereby verify that the contents of the present affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

20 NOV 2025

Verified at New Delhi on this ___ day of _____ 2025.



किशोरी लाल
DEPONENT

Solemnly affirmed before me
Readover & Explained to the Deponent
who has signed before me.

KK Mishra

KRISHNA KUMAR MISHRA
NOTARY PUBLIC (DELHI)
GOVT. OF INDIA

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

20 NOV 2025



GOVERNMENT OF NATIONAL CAPITAL TERRITORY OF DELHI
OFFICE OF THE SUB DIVISIONAL MAGISTRATE (KAPASHERA) SW DISTRICT
OLD TAX TERMINAL BUILDING, KAPASHERA, DELHI - 110 037

F.No.4 (102)/SDM (KH)/2013/

Dated:-

Sub: Action Taken Report on complaint of Sh. Kishori Lal r/o village Khar Khari
Jatmal, Delhi.

Reference to subject cited above it is submitted with due regards that:

- The complainant has alleged of illegal bore wells on the Gaon Sabha Land in Kh. No. 36//5, 37//1, 2, 16//25, 21//6, 21//15/1, 22//1, 21//14 & 8//18 situated in village Kh. Kh. Jatmal.
- The Halka Patwari, on a field enquiry, reported that four illegal borewells exist only Khasra Nos. i.e. 8//18, 16//16, 36//5 & 37//1.
- The Undersigned issued an order No. F.4 (102)/SDM(KH)/2013/1585 dated 8/4/2013(Copy enclosed) u/s 5 of Environment Protection Act 1986 to seal all the illegal Bore wells.
- The team constituted for the above purpose sealed the three bore wells and reported that the tube well at Khasra No. 37//1 was not in functioning condition (copy of Halka Patwari alongwith photograph enclosed).

Submitted for kind perusal and further directions, if any.


8/4/13
(RAVI DHAWAN, IAS (P)
SDM (KAPASHERA)

19

Village. KherKher. Jatmat

Date. 17-11-2025

Time. 11.30.am

Village. KherKher. Jatmal
Date. 17-11-2025
Time. 11.30. am

19/2

15/3

Village. KherKher. Jatmal

Date. 17-11-2025

Time. 11.30.am

21



○ REDMI NOTE 5 PRO
MI DUAL CAMERA

120



Village.KherKher.Jatmal

Date.17-11-2025

Time.11.30.am

●○ REDMI NOTE 5 PRO
MI DUAL CAMERA

121

15/8

K.K.J FAST FOOD CORNER

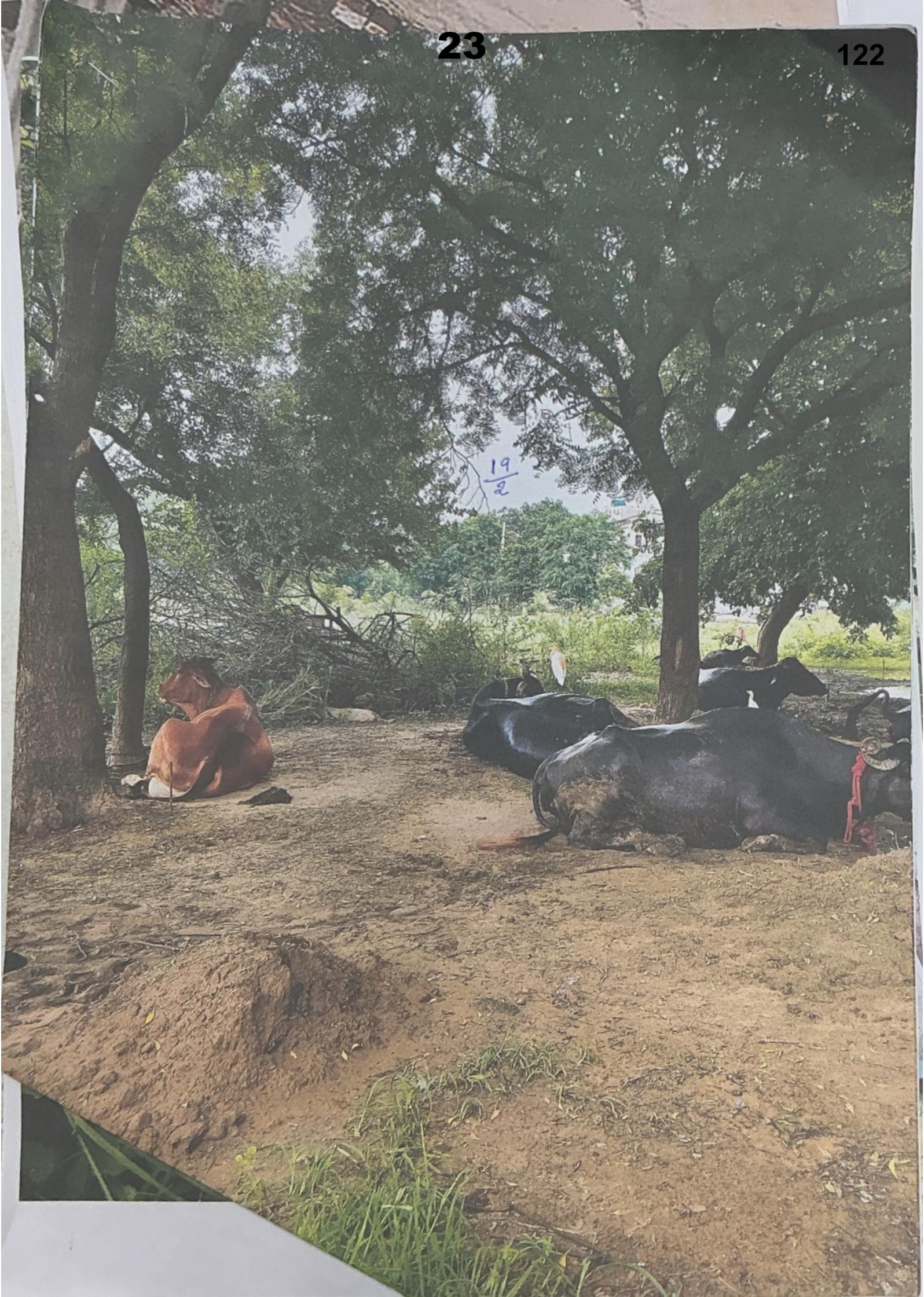
Village.KherKher.Jatmal
Date.17-11-2025
Time.11.30.am

REDMI NOTE 5 PRO
MI DUAL CAMERA

22



REDMI NOTE 5 PRO
MI DUAL CAMERA



19
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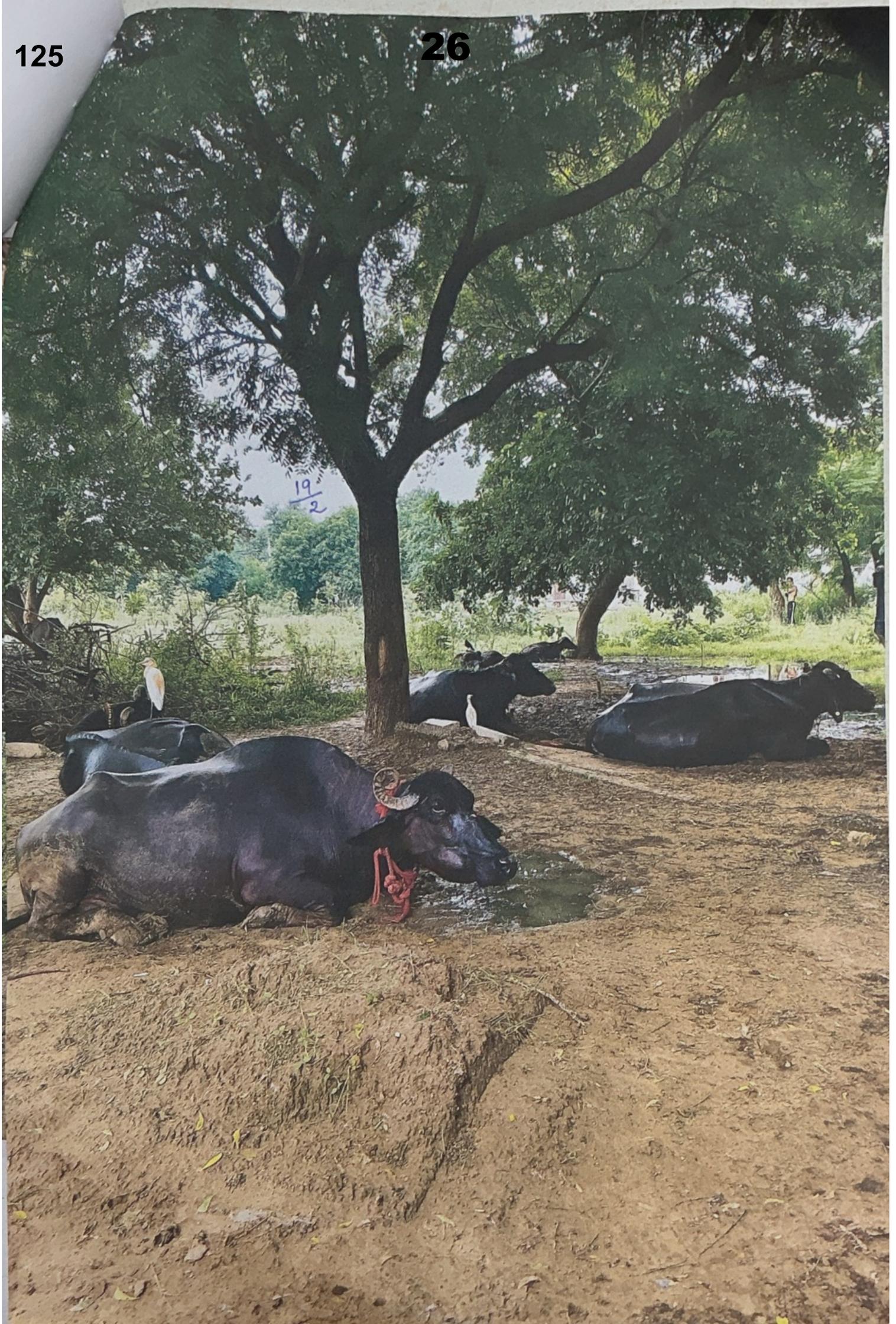
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15/8



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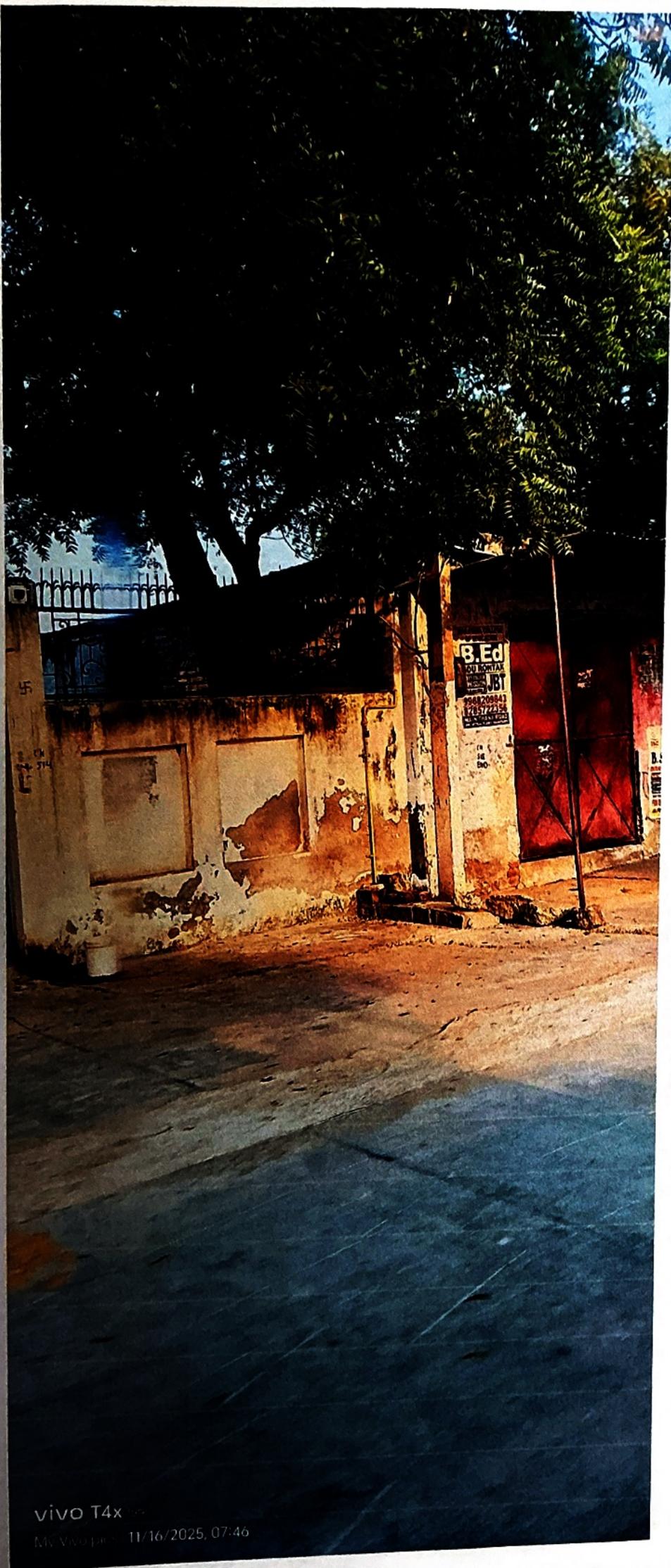


15
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15/8

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