

NDOH: 05.02.2025

BEFORE THE NATIONAL GREEN TRIBUNAL  
 PRINCIPAL BENCH AT NEW DELHI  
 ORIGINAL APPLICATION NO. 833 OF 2024

**IN THE MATTER OF:**

VIPIN KUMAR

...APPLICANT

VERSUS

UTTARAKHAND POLLUTION CONTROL

BOARD &amp; ORS.

...RESPONDENTS

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FILED BY:

New Delhi  
 Date: 23.11.2024

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**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
O.A. NO. 833 OF 2024**

**IN THE MATTER OF:**

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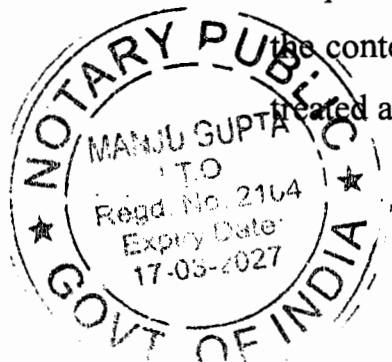
UTTARAKHAND POLLUTION CONTROL  
BOARD & ORS.

...RESPONDENTS

**REJOINDER AFFIDAVIT OF THE APPLICANT TO THE SHORT  
REPLY/ PRELIMINARY OBJECTIONS FILED BY THE  
RESPONDENTS 5 AND 6**

I, Vipin Kumar, aged 52 years, s/o Shri Karan Singh, R/o Village Mohammadpur Jat, Tehsil Roorkee, District Haridwar, Uttarakhand 247670, do hereby affirm and state as under-

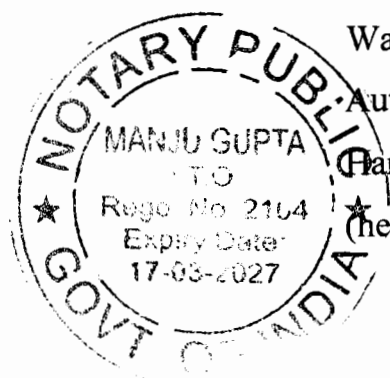
1. I say that I am the Applicant in the captioned OA and I am aware of the facts of the case and am competent to file the present rejoinder affidavit to the short reply/ preliminary objections filed by the Respondents 5 and 6.
2. I have perused the contents of the Short Reply filed by the Respondent No. 5 and 6 dated 19.10.2024. At the outset I state that the contents of the same are denied and no part of the same maybe treated as having been admitted for lack of specific denial.



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**PARA WISE REJOINDER -**

1. That the contents of para 1 need no reply.
2. That the contents of para 2 are denied and it is stated that the present OA is very much maintainable for the reasons stated in the following paras. It may be noted that the Respondents 5 and 6 have not filed any reply on the merits of the OA and hence the contentions of the Applicant are deemed to be admitted by them and the relief as prayed for ought to be granted to the Applicant.
3. That the contents of para 3 are misconceived and denied. The submission of the Respondents 5 and 6 is that the impugned CCA's dated 07.06.2024 are appealable orders u/s 31 of the Air Act, and thus the present OA which seeks quashing of the impugned CCA's by invoking the original jurisdiction of this Hon'ble Tribunal u/s 14 of the NGT Act, 2010, is not maintainable. However, the said submission is legally incorrect for the following reasons, which are set out without prejudice to each other.
  - 3.1 A bare perusal of the impugned CCA's annexed at pages 30 and 35 of the OA would show that the CCA's are composite and have been issued under under three distinct statutory provisions, i.e. (i) Consent relating to Section 21 of the Air (Prevention & Control of Pollution) Act, 1981, (ii) Consent relating to Section 25 of the Water (Prevention & Control of Pollution) Act, 1974, and (iii) Authorization under Rule 6 of the Hazardous Waste (Management, Handling, and Transboundary Movement) Rules, 2016, (hereinafter 'the HW Rules') which have been notified by

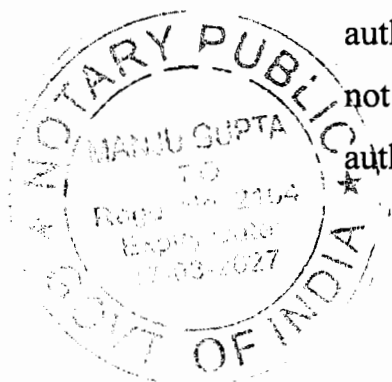


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MOEFCC in exercise of powers under Sections 6, 8 and 25 of the Environment (Protection) Act, 1986. This clearly indicates that the CCA issued is under a composite framework encompassing various provisions under separate Acts, rather than a single statute. Thus, in other words, the CCA being a composite document is simultaneously relatable to all the three above mentioned statutes/rules and cannot be traced to one single statute/rule only. True copy of the Hazardous Waste (Management, Handling, and Transboundary Movement) Rules, 2016 dated 04.04.2016 is **Annexure R-1**.

3.2 Having regard to the above position which is evident on the face of the document itself, it would now be apposite to look at the appellate provisions under the respective statutes/rules.

- (i) Consent granted under Section 25 of the Water Act is an appealable order u/s 28 of the said Act.
- (ii) Consent granted under section 21 of the Air Act is an appealable order under 31 of the said Act.
- (iii) However, there is no provision for appeal in the HW Rules with respect to authorization granted under Rule 6 thereof. The provision of appeal under Rule 24 of the HW Rules extends only to suspension/cancellation/refusal/renewal of authorization by the State PCB's. Admittedly, the present is not a case of suspension/cancellation/refusal/renewal of authorization of the impugned CCA's, hence, the



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authorization granted to Respondent No.5 and 6 under Rule 6 of the HW Rules is not appealable under the Rules.

For the convenience of this Hon'ble Tribunal, the relevant Rule 24 of the HW Rules is extracted below -

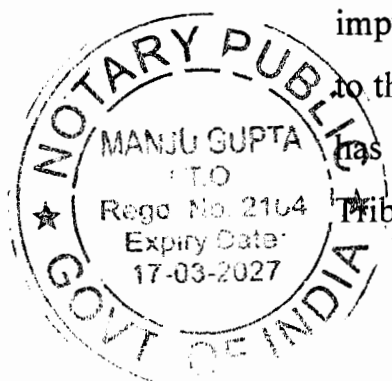
*Rule 24(1). Appeal - Any person aggrieved by an order of suspension or cancellation or refusal of authorisation or its renewal passed by the State Pollution Control Board may, within a period of thirty days from the date on which the order is communicated to him, prefer an appeal in Form 12 to the Appellate Authority, namely Environment Secretary of the State.*

*(2) The Appellate Authority may entertain the appeal after expiry of the said period of thirty days, if it is satisfied that the appellant was prevented by sufficient cause from filing the appeal in time.*

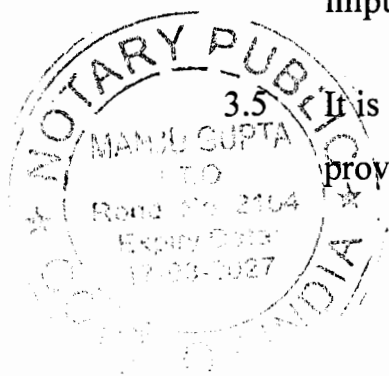
*(3) Every appeal filed under this rule shall be disposed of within a period of sixty days from the date of its filing.*

- (iv) Further, the HW Rules are notified under the Environment Protection Act, 1986, which itself does not make any provision for appeal.

3.3 Thus, in the absence of any provision for appeal under the HW Rules, or the parent Environment Protection Act, 1986, against an order granting authorization under Rule 6 of the HW Rules, the impugned CCA's which equally relate to the HW Rules as well as to the Air and Water Acts, are not appealable. Thus the Applicant has rightly invoked the original jurisdiction of this Hon'ble Tribunal seeking quashing of the impugned CCA's.



3.4 In this context it is apposite to note the facts of the case. The Respondents 5 and 6 were originally granted CCA's for the first time on 13.01.2023 and 30.01.2023 respectively. The same were challenged by the present Applicant in OA No. 341 of 2023 as they were in violation of the siting criteria set out in the MOEFCC notification dated 22.02.2022. This Hon'ble Tribunal vide judgment dated 12.10.2023 in OA No. 341 of 2023 set aside the CCA's and directed the UKSPCB to reconsider the application of the Respondents 5 and 6 for grant of CCA after duly considering the siting criteria as notified in the MOEFCC notification dated 22.02.2022. The matter went up to the Supreme Court in Civil Appeal Nos. 5596 of 2024 and 6565 of 2024 respectively, whereby the Supreme Court did not disturb the order of this Hon'ble Tribunal on merits but only directed that the application of the Respondents may be reconsidered independently and on merits and without being influenced by any of the observations of this Hon'ble Tribunal in the judgment dated 12.10.2023. Pursuant to the said orders, the impugned CCA's have been issued. Thus, the impugned CCA's clearly relate to the original application of the Respondents 5 and 6 for grant of CCA, which was directed to be reconsidered by the State PCB both by this Hon'ble Tribunal and the Hon'ble Supreme Court, and it is not a case of suspension/cancellation/refusal/renewal of authorization of the impugned CCA's, against which appeal is provided for.



3.5 It is well settled that an appeal is not a matter of right and must be provided for by law, otherwise no appeal would lie. Reliance is

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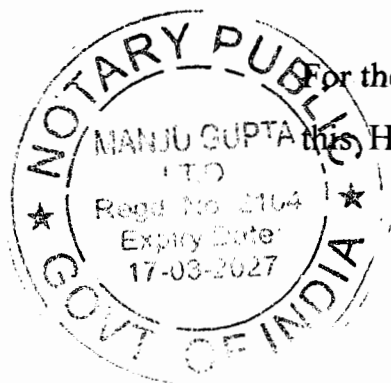
placed on *Ganga Bai vs Vijay Kumar* [(1974) 2 SCC 393], in which the Hon'ble Supreme Court held that-

*15. It is thus clear that the appeal filed by Defendants 2 and 3 in the High Court was directed originally not against any part of the preliminary decree but against a mere finding recorded by the trial court that the partition was not genuine. The main controversy before us centres round the question whether that appeal was maintainable. On this question the position seems to us well established. There is a basic distinction between the right of suit and the right of appeal. There is an inherent right in every person to bring a suit of a civil nature and unless the suit is barred by statute one may, at one's peril, bring a suit of one's choice. It is no answer to a suit, howsoever frivolous to claim, that the law confers no such right to sue. A suit for its maintainability requires no authority of law and it is enough that no statute bars the suit. But the position in regard to appeals is quite the opposite. The right of appeal inheres in no one and therefore an appeal for its maintainability must have the clear authority of law. That explains why the right of appeal is described as a creature of statute.*

A similar view was expressed in *Vijay Prakash Mehta & Anr. vs Collector of Customs* [1988 (4) SCC 402]:

9. Right to appeal is neither an absolute right nor an ingredient of natural justice the principles of which must be followed in all judicial and quasi-judicial adjudications. The right to appeal is a statutory right and it can be circumscribed by the conditions in the grant.

For the sake of brevity the Applicant is not burdening the record of this Hon'ble Tribunal with further citations, however it is only



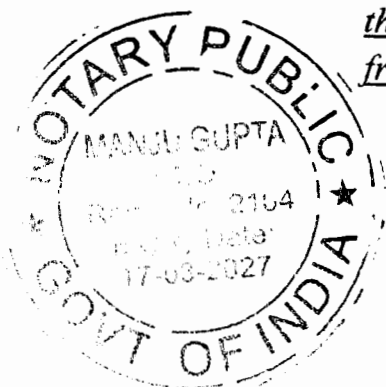
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relevant to state that several judgments of the Hon'ble Supreme Court have reiterated this principle.

Following this well settled proposition of law, it is reiterated that the impugned CCA's, being composite in nature, and equally relating to the HW Rules as well as to the Air and Water Acts, are not appealable in the absence of any provision of appeal against an order of grant of authorization under the HW Rules.

- 3.6 It is also well settled law that the scope of an appeal, being a right conferred by statute, must be strictly construed as per the statutory provision and cannot be expanded or restricted by any process of interpretation. In the present case, since Rule 24 of the HW Rules does not provide for any appeal against grant of authorization under Rule 6, no appeal can be entertained by any authority, even the appellate authority under the HW Rules, against such grant of authorization. The appellate authority under the HW Rules is confined only to entertaining appeals against the suspension/cancellation/refusal/renewal of authorization, which is not the case here. Reliance is placed on *Rajkumar Shivhare vs. Directorate of Enforcement (2010) 4 SCC 772* wherein the Hon'ble Supreme Court held that –

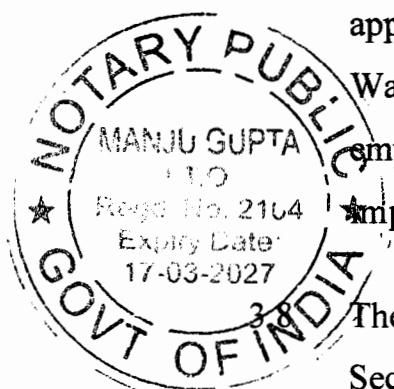
*29. By referring to the aforesaid schemes under different statutes, this Court wants to underline that the right of appeal, being always a creature of a statute, its nature, ambit and width has to be determined from the statute itself. When the language of the statute regarding the nature of the order from which right of appeal has been conferred is clear, no*



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statutory interpretation is warranted either to widen or restrict the same.

3.7 Applying the above principle, it also follows that the appellate authorities constituted under the Air and Water Acts are also bound and limited by the powers expressly conferred upon them by their respective parent statutes and cannot exceed their jurisdiction by entertaining appeals against orders for which no provision of appeal has been made in law, much less entertain appeals against orders passed under other laws. The appellate authority u/s 31 of the Air Act can only entertain an appeal against “...an order made by the State Board under this Act...”, meaning thereby, it is only competent to entertain appeals against orders issued under the Air Act. It cannot entertain any appeal against orders issued under the Water Act or the HW Rules. Similarly, the appellate authority under Section 28 of the Water Act can only entertain appeals against “...an order made by the State Board under section 25, section 26 or section 27...” of the Water Act, and lacks jurisdiction to entertain appeals against any order made under the Air Act or the HW Rules. The impugned CCA’s being composite documents under the Air and Water Acts and the HW Rules, are thus not appealable under either Section 31 of the Air Act or u/s 28 of the Water Act. For this reason also, this Hon’ble Tribunal is empowered to entertain the present OA seeking quashing of the impugned CCA’s.



The original jurisdiction of this Hon’ble Tribunal flows from Section 14 of the NGT Act, which empowers it to adjudicate

disputes of civil nature where a substantial question of environment is involved. In the present matter, vide order dated 25.07.2024 the Hon'ble Tribunal was pleased to issue notice, having formed a view that the Original Application raises substantial issues related to compliance with environmental norms. Thus, once this Hon'ble Tribunal has reached such satisfaction, the OA is maintainable.

3.9 In *Municipal Corporation of Greater Mumbai vs. Ankita Sinha & Ors.* (2022) 13 SCC 401 the Hon'ble Supreme Court has interpreted the wide scope of powers and authority of NGT under section 14 as under -

*"...65. In the same spirit, we find merit in the arguments that Section 14(1) exists as a stand-alone feature, not constricted by the operational mechanism of the subsequent sub-sections. When it is a case warranting NGT's intervention, or may be a situation calling for decisions to meet certain exigencies, the functions under Section 14(1) can be undertaken and those may not involve any formal application or an adjudicator process. However, the later provisions may not work in similar fashion. Therefore, care must be taken to ensure unrestricted discharge of the responsibilities under Section 14(1) and that wide arena of NGT's functioning...".*

*"...68. To be effective in its domain, we need to ascribe to NGT a public responsibility to initiate action when required, to protect the substantive right of a clean environment and the procedural law should not be obstructive in its application. In the context, V.R. Krishna Iyer, J. speaking for a Division Bench in State of Punjab v. Shamlal Murari has so correctly prioritised the substantive rights and observed succinctly: (SCCp. 722, para 8)*



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*“8. ... We must always remember that processual law is not to be a tyrant but a servant, not an obstruction but an aid to justice. It has been wisely observed that procedural prescriptions are the handmaid and not the a mistress, a lubricant, not a resistant in the administration of justice.”*

*“...78. When substantive justice is elusive for a large segment, disengaging with substantive rights at the very altar, for a perceived procedural lacuna, would surely bring in a process, which furthers inequality, both economic and social...”*

*“...Instead, a recognition of the historical experience of marginalised classes of persons while accessing and effectively using the legal system, will allow for necessary appreciation of social realities and balancing the arm of justice....”*

3.10 It is also pertinent to mention that the present OA satisfies all the requirements of section 14, in as much as it is a civil matter; it raises substantial question relating to the environment; and, such questions arise out of the implementation of the enactments specified in Schedule 1 to the Act. Thus, for this reason also, this Hon’ble Tribunal is competent to entertain this OA.

In *MCGM vs. Ankita Sinha (2022) 13 SCC 401* the Hon’ble Supreme Court, interpreting the NGT Act, held that –

*64. Section 14(1) of the NGT Act deals with jurisdiction, and the jurisdictional provision conspicuously omits to specify that an application is necessary to trigger NGT into action. ★ In situations where the three prerequisites of Section 14(1) i.e. civil cases; involvement of substantial question of environment; and implementation of the enactments in Schedule I are satisfied, the jurisdiction and power of NGT*



gets activated. On these material aspects, NGT is not required to be triggered into action by an aggrieved or interested party alone. It would therefore be logical to conclude that the exercise of power by NGT is not circumscribed by receipt of application. When substantial questions relating to the environment arise and the issue is civil in nature and those relate to the enactments in Schedule I to the Act, NGT in our opinion even in the absence of an application, can self-ignite action either towards amelioration or towards prevention of harm.

Thus, the Hon'ble Supreme Court not only held that the jurisdiction of this Hon'ble Tribunal can get activated on satisfaction of all three essential ingredients of Section 14, but this Hon'ble Tribunal may even *suo moto* invoke its jurisdiction in absence of an Application. Further, invocation of jurisdiction of this Hon'ble Tribunal need not await a petition by an aggrieved or interested party alone. In view of this position of law, it is untenable for the Respondents to contend that the OA is not maintainable on grounds of alternate remedy of appeal.

Reliance is also placed on the judgment of this Hon'ble Tribunal in *M.C. Mehta vs. University Grants Commission* OA No. 12 of 2014 decided on 17.07.2014 wherein this Hon'ble Tribunal was pleased to hold -



*12. This Tribunal is vested with three different jurisdictions. Firstly, it has the original jurisdiction in terms of Section 14 of the NGT Act to deal with all civil cases raising a substantial question relating to environment and where such questions arise out of the implementation of the enactments specified in Schedule I of the NGT Act. Secondly, it is vested*

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with appellate jurisdiction against the various orders/directions/decisions as stated in Section 16 (a) to (j) of the NGT Act. Thirdly it has a special jurisdiction in terms of Section 15 to grant relief of compensation and restitution as per the scheme contemplated under that provision. Admittedly, the present application has been filed under Section 14 of the NGT Act. Thus, it must plead and raise the following:

- a) It should be a civil case.
- b) Where a substantial question relating to environment or enforcement of any legal right relating to environment is involved.
- c) Such question arises out of implementation of enactment specified in Schedule I of the NGT Act.

13. Once these three ingredients are satisfied, then Section 14 does not appear to place any restriction on the locus or character of the Applicant who wishes to move an application under Section 14 of the Act. Similarly, Section 15 also does not describe the description of an Applicant who can move the Tribunal for seeking reliefs like compensation, restitution of the property and the environment. In contradistinction thereto, Section 16 restricts the Applicant entitled to file an Appeal to be 'any person aggrieved'. In other words, it is only a person aggrieved who can invoke the jurisdiction of the Tribunal under Section 16 and not any Applicant. Section 18 deals with the procedure which has to be followed by an applicant or appellant, who prefers to file an application or appeal before the Tribunal. It deals with all the three jurisdictions specified under Section 14, 15 and 16 of the NGT Act. However, Section 18 (2) of the NGT Act provides the details in regard to locus and character of an Applicant who is entitled to move the Tribunal by filing an Application for grant of relief or compensation or settlement of dispute. Section 18(2) has been worded by the legislature with wide amplitude besides



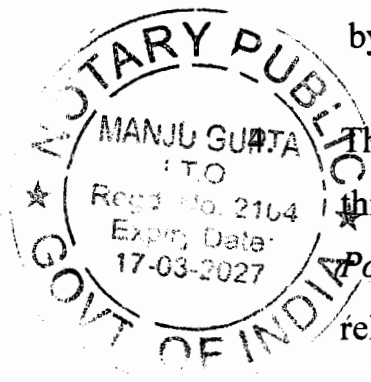
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*covering any person aggrieved and the legal representatives of the various categories. In terms of Section 16, it includes various other persons as described under clauses (a) to (d) and (f) of sub-Section 2 of Section 18. The locus and character of an applicant specified under these provisions has to receive liberal construction and would cover variety of applicants. As far as Section 14 (1) of the NGT Act is concerned, the only restriction that appears to be imposed is that it must satisfy the prerequisites stated in that Section.*

3.11 The Respondents are also estopped from raising the objection as to maintainability of this OA as they failed to raise any such objection in the earlier rounds of litigation. As noted above, the Applicant had earlier filed OA No. 341 of 2023, challenging the original CCA's granted to Respondents 5 and 6. That OA was disposed off by this Hon'ble Tribunal on 21.10.2023. The matters further went up to the Hon'ble Supreme Court in Civil Appeal Nos. 5596 of 2024 and 6565 of 2024 respectively. Neither before this Hon'ble Tribunal nor before the Hon'ble Supreme Court did the Respondents question the maintainability of the OA. Hence, the present OA cannot be questioned on maintainability either.

3.12 For the said reasons, the objection of the Respondents 5 and 6 as to maintainability of this OA are untenable and deserve to be rejected by this Hon'ble Tribunal.

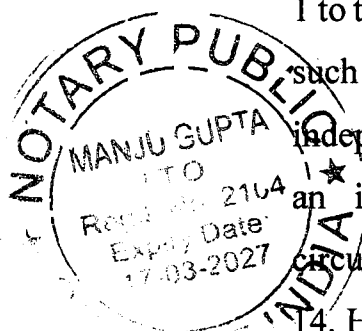
The contents of Paragraphs 4 are false and denied. The judgment of this Hon'ble Tribunal in *Athippa Chemicals P. Ltd. vs. Puducherry Pollution Control Board [O.A. No. 30 of 2011]* dated 14.12.2012 relates to orders passed u/s 31A of the Air Act. In that context this



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Hon'ble Tribunal held that the impugned order in that case was appealable u/s 31 of the Air Act and OA u/s 14 was not maintainable. That was not a case of a composite order encompassing three different statutes/rules, as is the present case. None of the aspects highlighted above were decided by this Hon'ble Tribunal in the said judgment. Hence, the said case is distinguishable on facts and is inapplicable to the present OA.

5. That the contents of para 5 are misleading and denied. The judgments of this Hon'ble Tribunal in *Yashovardhan Sharma Shandilya* and *Abhishek Chaurasia* relate to challenge to environmental clearance which is specifically appealable u/s 16(h) of the NGT Act. The said cases do not deal with the present situation of a composite CCA being issued under three different enactments. Hence these cases are also distinguishable on facts.
6. That the contents of para 6 are misleading and denied. The jurisdiction of this Hon'ble Tribunal u/s 14 of the Act is wide and is activated upon satisfaction of all three essential ingredients, i.e. civil case, substantial question relating to the environment, and such question arising out of any of the enactments specified in Schedule 1 to the Act. Section 14(2) empowers this Hon'ble Tribunal to settle such disputes and pass orders thereon. Thus, S.14 is a complete and independent power of this Hon'ble Tribunal in itself. Section 15 is an independent provision, which does not, indeed cannot, circumscribe in any manner the power of this Hon'ble Tribunal u/s 14. Hence, reliance on Section 15 to contend that no orders can be passed in exercise of original jurisdiction of this Hon'ble Tribunal

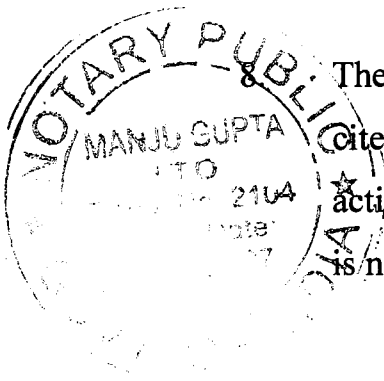


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to quash the CCA's, is thus misplaced. The Applicant once again relies on the judgments of the Supreme Court in *Ankita Sinha* and this Hon'ble Tribunal in *M.C. Mehta* as quoted above.

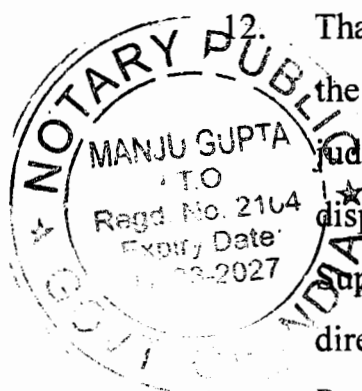
7. The contents of para 7 are false and denied. The Answering Respondents 5 and 6 have wrongly contended that the Original Application is barred by limitation under Section 14(3) of the NGT Act. This OA challenges the Consolidated Consent to Operate (CCA) issued on 07.06.2024 to both the Respondent No. 5 and 6. The OA was filed on 13.07.2024 and notice was issued by this Hon'ble Tribunal on 25.07.2024. Hence the OA is well within limitation u/s 14(3). The grounds of challenge are based inter alia on violation of the MOEFCC notification dated 22.02.2022, however that notification cannot be conflated to be a cause of action in itself. The law is well settled that while determining the preliminary objection as to maintainability, the cause of action has to be determined on reading of the averments made in the plaint (in this case the OA) and not based on the interpretation provided by the Defendant/Respondent. Reliance is placed on a recent judgment of the Hon'ble Supreme Court in *Eldeco Housing & Industries Ltd. Vs. Ashok Vidhyarthi & Ors. 2023 INSC 1043*.

The contents of para 8 are misleading and denied. The judgment cited is wholly inapplicable to the facts of this case as the cause of action is based on the impugned CCA's dated 07.06.2024 and there is no delay in filing the OA.



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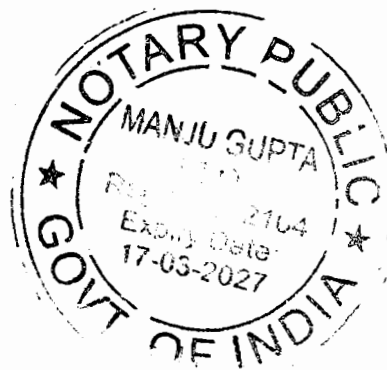
9. That the contents of para 9 are false and denied. It is reiterated, as submitted above, that no appeal lies against the impugned CCA's for the detailed reasons explained above, either under the Air Act or the Water Act. Hence, the contention of the Respondents that they would lose out on a valuable right of second appeal as provided u/s 16(f) is without any basis.
10. That the contents of para 10 are false and denied and it is reiterated, for the detailed reasons set out above, that the impugned CCA's are not appealable and hence there is no question of the present OA being barred on grounds of available alternative statutory remedy. The judgment of the Hon'ble Supreme Court as cited is thus distinguishable on facts and is inapplicable to this case.
11. That the contents of para 11 are false and denied and averments made above are reiterated herein, to the effect that the impugned CCA's are not appealable and hence there is no question of the present OA being barred on grounds of available alternative statutory remedy. The judgment of the Hon'ble Supreme Court as cited is thus distinguishable on facts and is inapplicable to this case.
12. That the contents of para 12 are false and denied. A bare perusal of the orders of the Hon'ble Supreme Court would reveal that the judgment of this Hon'ble Tribunal dated 21.10.2023 was not disputed on merits by the Respondents, nor did the Hon'ble Supreme Court entertain the appeal on merits. The only limited direction passed was to reconsider the Application of the Respondents for grant of CCA without being influenced the



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observations of the Hon'ble Tribunal. This clearly means that the legal issue as settled by this Hon'ble Tribunal, that the siting criteria as set out in the MOEFCC notification dated 22.02.2022 ought to have been considered before granting the CCA to the Respondents, was not disturbed by the Hon'ble Supreme Court; and the UKPCB was required to make a fresh determination after duly considering the said siting criteria. The UKPCB however simply reissued the CCA's without determining the violation or compliance of siting criteria under the 22.02.2022 notification. Neither the UKPCB in its reply, nor the present Respondents 5 and 6, have averred or shown how they are in compliance with the said siting criteria. Thus, the impugned CCA's are illegal and hence the OA was filed praying to have the same quashed. Thus, the OA is very much maintainable before this Hon'ble Tribunal.

13. That the contents of para 13 are false and denied and it is reiterated, as submitted above, that the OA is maintainable and is not barred on account of alternative remedy of appeal, as no appeal lies against the impugned CCA's.
14. That the contents of para 14 are denied and it is reiterated that the Respondents have failed to submit any reply on the merits of the OA and hence the same are deemed to be admitted.



  
DEPONENT

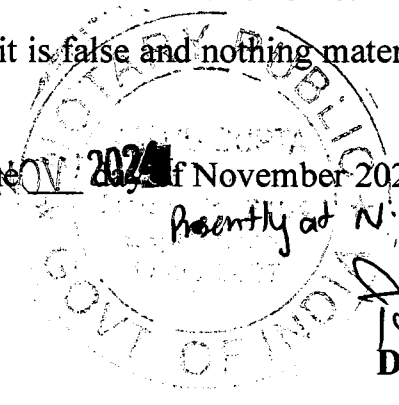
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**VERIFICATION**

That the contents of the above paras are true and correct to the best of my knowledge and belief, no part of it is false and nothing material has been concealed there from.

Verified at \_\_\_\_\_ on 23 the NOV day of November 2024

Presently at N. Delhi



*[Signature]*  
DEPONENT

Identified  
By *[Signature]*  
Name \_\_\_\_\_  
Address \_\_\_\_\_



*[Signature]*  
NOTARY PUBLIC  
DELHI

23 NOV 2024



## Proof of Service

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Krishna Veer &lt;krishnaveer100@gmail.com&gt;

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### **Advance service of Rejoinder Affidavit on the Applicant to the Short Reply/Preliminary Objections filed by the R5 &6 and Rejoinder of the Applicant to Response filed by UKPCB dated 18.10.2024**

1 message

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**Krishna Veer** <krishnaveer100@gmail.com>

Sat, Nov 23, 2024 at 1:35 PM

To: msukpcb@yahoo.com, ajayagarwal.cpcb@nic.in, dm-har-ua@nic.in, mcfcc@gov.in

Dear Sir/Madam

Kindly find attached herewith the scanned copies Rejoinders Affidavit on the Applicant to the Short Reply/Preliminary Objections filed by the R5 &6 and Rejoinder of the Applicant to Response filed by UKPCB dated 18.10.2024

Regards  
Krishan Veer, Clerk  
of Mr. Rohan Thawani, Adv.

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#### **2 attachments**

**Rejoinder to Short Reply Preliminary Objections filed by R5 and 6.pdf**

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**Rejoinder to Response filed the UKPCB.pdf**

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