

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

IA NO. 79 OF 2026

IN

OA NO. 915 OF 2024

IN THE MATTER OF

AMIT KUMAR

....APPLICANT

VERSUS

UNION OF INDIA & ORS.

....RESPONDENTS

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*Filed by:*



Amit Kumar  
(Applicant in person)  
Place: New Delhi  
Date: 02.02.2026

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
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**REPLY ON BEHALF OF ORIGINAL APPLICANT TO I.A. NO. 79/2026**

MOST RESPECTFULLY SHOWETH:

1. That the present reply is being filed to the Interlocutory Application (I.A. No. 79/2026) preferred by Shokinpal & Ors. (hereinafter "Proposed Impleaders"), seeking intervention/impleadment in the ongoing proceedings concerning alleged forest encroachments in Shivnagar, District Shamli.
2. It is submitted that the concerns raised by the Proposed Impleaders, specifically those pertaining to the historical status of the village, revenue records, and the validity of the joint demarcation report, fall squarely within the administrative and statutory domain of the State authorities. The Respondent No. 4 (District Magistrate, Shamli) and Respondent No. 7 (Forest Department, Shamli) are the appropriate and competent authorities to address, verify, and adjudicate upon the factual assertions made in the IA.
3. That the Original Applicant lacks the legal and technical capacity to verify the extensive allegations made regarding Survey of India maps (Annexure A-5), Khasra overlays (Annexure A-6), or the implementation of various government welfare schemes (Annexures A-11 to A-14) cited by the Proposed Impleaders. These matters involve complex questions of fact and specialized land record verification that can only be authentically addressed by the Respondent No. 4 (DM Shamli) and Respondent No. 5, 6 & 7 (Forest Department) through their official records.
4. That the Original Applicant's primary objective in O.A. No. 915 of 2024 is the preservation and restoration of notified forest land, the Applicant refrains from making any specific comments on the veracity of the Proposed Impleaders' claims

regarding their individual titles or historical possession. The Applicant maintains that the determination of whether the subject land is "Reserved Forest" or "Revenue Abadi" is a matter of record to be submitted by Respondents No. 4 and 7 before this Hon'ble Tribunal.

5. It is further submitted that in any event where adverse action is contemplated against the affected residents, they must be granted an ample and meaningful opportunity to be heard by the responding authorities (Respondent No. 4 - 7) in accordance with the principles of natural justice. Furthermore, should this Hon'ble Tribunal find that eviction is necessary for the restoration of the forest, such action must be preceded by the production of a comprehensive Rehabilitation and Resettlement (R&R) plan by Respondent No. 4 (District Magistrate, Shamli). This is in line with the constitutional mandate and the settled law of the Hon'ble Supreme Court, ensuring that the right to shelter and dignity is preserved during the enforcement of environmental laws.
6. In view of the aforementioned facts, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to direct Respondent No. 4 and Respondent No. 7 to file a detailed factual response specifically addressing the technical allegations and eighteen (18) annexures raised in I.A. No. 79 of 2026, and further direct that a fair hearing is conducted and a formal Rehabilitation and Resettlement plan is placed on record by the District Administration as per the mandate of the Hon'ble Supreme Court.

#### VERIFICATION

Verified at New Delhi on this 3rd day of February 2026 that the contents of the above submission, are correct and true to the best of our knowledge, belief, and official records. No part of it is false, and nothing material has been concealed therein.

*Filed by:*



Amit Kumar  
(Applicant in person)  
Place: New Delhi  
Date: 03.02.2026