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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**

**PRINCIPAL BENCH, NEW DELHI**

**ORIGINAL APPLICATION NO. 227 OF 2025**

**IN THE MATTER OF:**

Naveen Solanki & Anr.

...Applicants

Versus

Rail Land Development Authority & Ors.

...Respondents

**N.D.O.H. 21.05.2026**

**REPLY ON BEHALF OF THE APPLICANTS TO THE ADDITIONAL  
AFFIDAVIT DATED 20.04.2026 FILED BY RESPONDENT NO.1**

**(PAGES 1 TO 27)**

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL****PRINCIPAL BENCH, NEW DELHI****ORIGINAL APPLICATION NO. 227 OF 2025****IN THE MATTER OF:**

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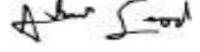
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**N.D.O.H. 21.05.2026****INDEX**

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**ALL PARTIES HAVE BEEN SERVED BY EMAIL**Through: Ankur Sood

D/485/2007

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New Delhi  
Dated - 20.05.2026

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 227 OF 2025**

**IN THE MATTER OF:**

NAVEEN SOLANKI & ANR.

...APPLICANTS

VERSUS

RAIL LAND DEVELOPMENT AUTHORITY & ORS.

...RESPONDENTS

**REPLY ON BEHALF OF THE APPLICANTS TO THE ADDITIONAL  
AFFIDAVIT DATED 20.04.2026 FILED BY RESPONDENT NO.1**

MOST RESPECTFULLY SHOWETH:

1. The present Reply is being filed on behalf of the Applicants in response to the Additional Affidavit dated 20.04.2026 filed by Respondent No.1 ("**Additional Affidavit**"). The Applicants deny all averments, submissions and allegations made therein save and except those specifically admitted herein.
  
2. The land parcel forming subject matter of the present proceedings presently contains extensive vegetation, substantial tree cover and active biodiversity with a large number of animals and birds, including:
  1. Greater Coucal
  2. Verditer Flycatcher (Uncommon & Migratory)
  3. Pied Bushcat (Female)
  4. Red Naped Ibis
  5. Pied Bushcat (Male)
  6. Yellow Wagtail

7. Common Tailorbird
8. White Wagtail
9. Green Sandpiper (Migratory)
10. Ruff (Migratory)
11. Eastern Orphean Warbler (Migratory & Rare)
12. Red Wattled Lapwing
13. White Eared Bulbul
14. Silverbill (Munias)
15. Prinia
16. Shikra (Raptor)
17. Laughing Dove
18. Indian Robin
19. Eurasian Thick-Knee
20. Indian White-Eye
21. Long-Tailed Shrike
22. Black-Winged Kite (Uncommon & Raptor)
23. Black Redstart
24. Oriental Magpie-Robin
25. Red-Breasted Flycatcher (Winter Migrant)
26. Common Hoopoe
27. Eurasian Collared Dove
28. Migratory Species of Flycatcher
29. Bluethroat
30. Red Whiskered Bulbul
31. Purple Sunbird (Male)
32. Lesser Goldenback Woodpecker
33. Red Vented Bulbul
34. Black Kite (Raptor)
35. House Sparrow
36. Sunbird (Female)
37. Yellow Footed Green Pigeon
38. Jungle Babbler
39. Common Woodshrike (Juvenile)
40. Coppersmith Barbet
41. Ashy Prinia
42. Brown-Headed Barbet

43. White Breasted Kingfisher
44. Common Myna
45. Rose Ringed Parakeet
46. Brahminy Myna
47. Cattle Egret
48. Pied Cuckoo (Migratory from Africa)
49. White Breasted Waterhen
50. Koel Asian Cuckoo (Male and Female)
51. Green Bee Eater
52. Oriental Honey Buzzard
53. Pond Heron
54. Wire Tailed Swallow
55. Eurasian Wryneck (Uncommon & Migratory)
56. Asian Pied Starling
57. Baya Weaver
58. Indian Grey Hornbill
59. House Crow
60. Indian Treepie
61. Bluebull or Nilgai (Largest Antelope of Asia)
62. Indian Cobra Snake
63. Feral Pig
64. Indian Bullfrog
65. Five Striped Palm Squirrel
66. Monitor Lizard
67. Peafowl

3. Respondent No.3 itself, through the affidavit filed before the Hon'ble Supreme Court, recorded existence of more than 19,000 trees on the subject land (**Pg. 154, Original Application**).
4. The Applicants have further placed on record photographs depicting existence of wildlife and avifauna on the project land including Nilgai and various bird species (**Annexure A/4, Pg. 88, Original Application**). The Applicants further rely upon the Note

submitted by the Learned Amicus Curiae before the Hon'ble Delhi High Court, (**Annexure A/5, IA No.605/2026, Pg. 34**) which also records presence of wildlife in the area. The aforesaid material itself demonstrates that the land presently functions as a significant urban ecological habitat requiring strict environmental safeguards and independent factual examination by this Hon'ble Tribunal.

5. Through the present Additional Affidavit, the Respondent No.1 has principally sought to rely upon: (i) the Stage-II/In-Principle Approval dated 27.11.2025 issued by MoEF&CC; (ii) the Office Memorandum dated 02.12.2025 issued by the Central Empowered Committee ("**CEC**") granting conditional approval for felling/transplantation of certain trees under the Delhi Preservation of Trees Act, 1994; and (iii) the judgment dated 20.03.2026 passed by the Hon'ble Supreme Court in Civil Appeal No.10656 of 2024, in order to contend that the subject land does not qualify as forest/deemed forest and that the Respondents are entitled to proceed with the project activities subject to statutory compliances.
6. The Respondent No.1 has further sought to contend that the project forms part of a statutory Master Plan, that the land was historically agricultural/barren in nature, that substantial portions of the vegetation comprise invasive species, and that adequate safeguards including transplantation and compensatory afforestation are being undertaken. The Applicants submit that the aforesaid contentions are misleading, incomplete and liable to be rejected for the reasons elaborated hereinafter.
7. At the outset, it is submitted that the Respondents, through the present Additional Affidavit, seek to create an erroneous

impression that the entire controversy raised in the present proceedings stands concluded solely on account of the judgment dated 20.03.2026 passed by the Hon'ble Supreme Court in Civil Appeal No. 10656 of 2024. The said position is wholly incorrect, misleading and contrary to the very findings contained in the said judgment.

8. The judgment dated 20.03.2026 passed by the Hon'ble Supreme Court was rendered in the specific factual context of the subject land involved in the proceedings before the Hon'ble Supreme Court, namely the approximately 30-acre parcel forming part of the mixed-use development component of the Bijwasan Railway Station Project. The Hon'ble Supreme Court itself proceeded on the basis of the specific factual matrix, pleadings, records and material placed before it in relation to the said parcel alone.
9. In fact, even during the pendency of the proceedings, the Hon'ble Supreme Court expressly clarified that the scope of the proceedings and interim protection stood confined only to the land forming subject matter of Original Application No. 697 of 2023 and that all contentions concerning any other land stood expressly kept open. Vide order dated 03.03.2025 (**A/37, Pg. 352, OA**), the Hon'ble Supreme Court observed that:

*"It is obvious that the interim relief granted under this Court's dated 17th September, 2024 will remain confined to the land/property subject matter of Original Application No.697 of 2023. Interim relief will continue to operate till the final disposal of the appeal. If the appellants have any grievance about any land which was not the subject matter of the Original Application, it is for the appellants to take out appropriate proceedings*

*in that behalf and all contentions in that behalf are kept open.”*

10. The aforesaid itself demonstrates that the Hon’ble Supreme Court consciously restricted the ambit of the proceedings before it to the approximately 30-acre parcel which formed subject matter of the Original Application and expressly left open all issues, remedies and contentions concerning any other land.
11. The judgment dated 20.03.2026 also expressly records the limited factual scope of adjudication before the Hon’ble Supreme Court. The Hon’ble Supreme Court specifically noted that:

*“2. The OA was filed challenging the Request for Proposal number RLDA/RFP/CD-85 of 2022 dated 19.12.2022 (“RFP”) issued by the Rail Land Development Authority, Respondent No.1 (“RLDA”) for the combined Multi-Use plot, MU4+MU5+MU6 Railway Land parcel (“subject land”) admeasuring approximately 1,24,000 sq. mtrs. or 12.40 hectares situated along New Bijwasan Railway Station, Delhi, on the plea that the subject land was part of forest land...”*

**(Pg. 17, Additional Affidavit)**

12. Thereafter, while returning its findings, the Hon’ble Supreme Court repeatedly confined itself to the “subject land” and the material pertaining thereto.
13. Accordingly, while the legal principles laid down by the Hon’ble Supreme Court may have relevance, the factual findings returned therein remain confined to the specific parcel which formed subject matter of the proceedings before the Hon’ble Supreme Court. The present proceedings would therefore necessarily require an

independent factual examination by this Hon'ble Tribunal on the basis of the material, records, characteristics and status pertaining to the land involved herein.

14. The judgment dated 20.03.2026 itself categorically records and preserves the obligation of the Respondents to obtain all necessary statutory permissions and comply with all applicable environmental safeguards before carrying out any felling, transplantation or construction activity:

*“67. In the light of above, we deem it appropriate to direct that all concerned authorities and implementing agencies shall make earnest efforts to ensure transplantation of native/indigenous trees to the maximum extent possible, and to preserve and protect existing trees and in particular native species in and around the project area. Further, prior to the commencement of any work on the site, compensatory afforestation shall be undertaken strictly in accordance with the applicable statutory provisions, rules, and guidelines, and in consonance with the permissions that may be granted by the competent authorities.”*

**(Pg, 62, Additional Affidavit)**

15. Given the extensive size of the land parcel involved in the present proceedings (as opposed to a much smaller fenced area that was the subject matter of proceedings before the Hon'ble Supreme Court) and the substantial existing flora, fauna and biodiversity recorded on site, it is essential that an appropriate ecological protection framework be devised and implemented before permitting any irreversible activity including tree felling, transplantation, excavation or construction.
16. The Hon'ble Supreme Court specifically recorded in Para 61 of its judgment **(Pg. 58, Additional Affidavit)** the undertaking of

Respondent Nos.1 and 2 that no work would be carried out in identified patches without obtaining all necessary permissions in accordance with law and further directed preservation and protection of existing trees and transplantation of native species to the maximum extent possible. [GIVE REFERENCE] In this regard, it is pertinent to note that no material has been placed on record demonstrating grant of permission by the competent Tree Officer in accordance with the mandatory procedure prescribed under the Delhi Preservation of Trees Act, 1994 (“**DPT Act**”) and the Delhi Preservation of Trees Rules, 1996 (“**DPT Rules**”). Section 8 of the DPT Act expressly provides as under:

**“8. Restrictions on felling and removal of trees.-**  
*Notwithstanding anything contained in any other law for the time being in force or in any custom or usage or contract and except as provided in this Act or the rules made thereunder, no person shall fell or remove or dispose of any tree or forest produce in any land... except with the previous permission of the Tree Officer.”*

17. The DPT Rules prescribe a detailed statutory procedure prior to grant of permission for felling, removal or disposal of trees. Rule 4 of the Delhi Preservation of Trees Rules, 1996 provides as under:

**“4. Form of application under section 9.-**  
*(1) Every application for permission for felling a tree shall be made in Form B.*  
*(2) Every application for removal or disposal of a tree or forest produce shall be made in Form C.”*

18. A perusal of Form B itself demonstrates the extensive mandatory particulars required prior to any permission for tree felling, including inter alia:

*“(vi) Total number of trees (species-wise) whose trunk or body is not less than 5 cm. in diameter at a height of 30 cms from the ground and whose height is not less than one metre from the ground.*

*(vii) The exact area (in Sq. metres) from which felling of trees for which permit is sought (description of the boundaries).*

*(viii) Total number of trees to be felled.*

*(ix) Trees to be felled are numerically numbered in paint, their girth measured at a height of 1.35 metres from ground level and their details species-wise are.*

*(xii) Intended use of land after felling of trees.*

*(xiii) Number and species of trees intended to be planted after felling (give details of arrangements for raising, planting and protecting trees).”*

19. Form B further mandates filing of:

*“(iii) Enumeration list (duly signed by the applicant).*

*(iv) Boundary list (duly signed by the applicant).*

*(v) Latest jamabandi of land record issued by the Tehsildar.*

*(vi) ‘No-Objection Certificate’ from the concerned local body.*

*(vii) ‘No-Objection Certificate’ from adjoining property owners.”*

20. Further, the affidavit prescribed under Form B specifically requires the applicant to declare:

*“That I have applied to the Tree Officer.....for permission to fell..... trees from the aforesaid property. All the trees have been numbered with paint.”*

21. Likewise, Form C governing removal/disposal of felled trees requires disclosure of:

*“(vii) Describe the circumstances under which the tree/s was/were felled i.e., whether the tree/s was/were felled after obtaining the permit (a copy of the permit is to be enclosed).”*

22. The Respondents have failed to place on record compliance with the aforesaid mandatory statutory requirements including any complete enumeration exercise, painted tree identification, approved Form B/Form C applications, khasra-wise particulars, boundary plans, disposal permissions or supporting affidavits contemplated under the Delhi Preservation of Trees Act, 1994 and the Rules framed thereunder.

23. The Respondents have failed to place on record any such application, permission, enumeration exercise, approved tree marking plan or compliance documentation in accordance with the aforesaid statutory scheme.

24. In fact, the record already demonstrates prior instances of unauthorized damage to trees by the Respondents. The Forest Department itself recorded as under:

*“As per the inspection it is pertinent to mention that breaking up of 4.2 acres (1.69 ha) out of 6.202 ha proposed project site damaging 91 trees has been observed without approval under Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 which is in violation of section 2 of Van (Sanrakshan Evam Samvardhan) Adhiniyam.”*

**(Ann. R/4-1, Reply by Resp. No.4, Pg. 1097)**

25. The aforesaid assumes even greater significance in view of the allegations and material placed on record showing continued

disturbance and damage to trees despite subsistence of interim protection orders passed by this Hon'ble Tribunal. The conditional safeguards imposed by the CEC therefore fully support the Applicants' contention that a strict supervisory and compliance framework is indispensable prior to permitting any further activity on the project land.

26. A bare perusal of the said Office Memorandum dated 02.12.2025 issued by the Central Empowered Committee demonstrates that the alleged approval is expressly conditional and subject to strict compliance with several mandatory safeguards including inter alia:
- a. Protection of specifically identified trees from felling/transplantation;
  - b. Mandatory colour-band demarcation of trees proposed to be felled, transplanted and retained;
  - c. Mandatory painting and numbering of trees;
  - d. Filing of an affidavit undertaking payment of penalty of Rs.5 lakhs per tree in case any unauthorized tree is affected;
  - e. Transplantation at specified locations; and
  - f. Compliance with all conditions imposed by the Hon'ble Supreme Court in W.P.(C) No.4677/1985.
27. Significantly, the CEC itself directed that the aforesaid exercise was required to be completed before any permission is granted by the Tree Authority.
28. The Respondents have failed to place on record that any of the aforesaid exercises have been carried out.

29. In the absence of the aforesaid material, the Respondents cannot seek to rely upon the CEC Office Memorandum as though it constitutes blanket authorization for unrestricted site activity.
30. Without prejudice to the aforesaid, the Applicants submit that the conduct of Respondent No. 1 during the pendency of the present proceedings itself necessitates strict scrutiny of the assertions made in the present Additional Affidavit.
31. The Applicants state that despite subsistence of the interim orders dated 29.05.2025 and 10.07.2025 passed by this Hon'ble Tribunal restraining cutting, damaging or uprooting of trees on the subject land, continued activity was observed on site including movement of machinery, disturbance of soil and clearing activity in portions of the project land.
32. The Applicant has taken pictures on the subject land which clearly depict fresh deforestation, use of machinery, movement of soil and destruction of trees on the subject land after the passing of the restraint order dated 29.05.2025. A compilation of pictures of deforestation taken on the subject land on 19.01.2026 is annexed herewith and marked as **Annexure R/1**.
33. The Applicants submit that large-scale dumping of C&D waste and debris directly upon and around standing trees on the project land is itself resulting in continuing damage and destruction of multiple trees and their root systems, thereby constituting an independent and ongoing violation of environmental and tree protection norms. A recent geo-tagged photograph dt. 09.05.2026 evidencing dumping of C&D waste and debris directly upon and around standing trees on the project land, resulting in continuing damage to tree clusters and root systems, is annexed herewith as **Annexure R/2**.

34. The aforesaid conduct assumes significance since the present Additional Affidavit similarly seeks to place selective reliance upon the Office Memorandum dated 02.12.2025 and other alleged permissions without placing on record complete material demonstrating compliance with the conditions attached thereto, the actual extent of permissions granted, or the safeguards implemented on ground.
35. In these circumstances, the assertions made in the Additional Affidavit cannot be accepted at face value and require strict scrutiny by this Hon'ble Tribunal, particularly in relation to compliance with statutory safeguards, preservation obligations and the actual activities undertaken on the subject land.
36. It is further submitted that the Respondents are also misreading and overextending the observations made by the Hon'ble Supreme Court in relation to invasive species. The Hon'ble Supreme Court has nowhere held that the mere presence of invasive species automatically excludes an area from being considered environmentally significant or ecologically functional.
6. On the contrary, the Hon'ble Supreme Court itself observed in Para 66 of its judgment that such questions are necessarily contextual and dependent upon the actual ecological impact in a given case:
- “Before parting with this judgment, we would like to add that in assessing whether a parcel of land possesses characteristics associated with forest ecosystem, it is necessary to consider whether the vegetation forms part of a naturally evolved indigenous ecosystem or whether it represents the spread of invasive species which may in fact signify ecological disturbance.”*
- (Pg. 61, Additional Affidavit)**

7. The Applicants have already placed on record material demonstrating that the vegetation present on the subject land presently supports biodiversity and wildlife activity. **(Ref. IA/605/2025: A/10, Pg. 51@89; A/11, Pg. 101@105; A/12, Pg. 111@113; A/14 Pg. 118)**
  
37. The Applicants submit that regardless of the origin of certain species, the actual ecological role currently played by the vegetation and landscape requires independent assessment based on ground realities.
  
38. In fact, in several urban and peri-urban ecosystems, species categorized as invasive have over time become integrated into functioning ecological habitats supporting wildlife, avifauna and soil stabilization. The Respondents have placed no independent scientific assessment on record to demonstrate that the existing vegetation and tree cover on the project land presently causes ecological harm or fails to support biodiversity. On the contrary, the photographic evidence placed by the Applicants demonstrates active wildlife presence on the land. **(Ref. Annexure A/4, Pg. 88, Original Application)**
  
39. The aforesaid material clearly demonstrates that the project land presently constitutes an active ecological and wildlife-supporting landscape irrespective of historical land-use classification, and therefore requires assessment on the basis of existing environmental functionality and ground realities rather than solely on historical revenue descriptions.

40. The Respondents have also failed to disclose whether any wildlife impact assessment, habitat assessment, biodiversity survey or ecological carrying-capacity study has been conducted prior to the proposed large-scale felling/transplantation activity. It is respectfully submitted that urban ecological systems cannot be evaluated without regard to biodiversity value, habitat continuity, ecological services and wildlife dependence.
  
41. The Applicants further submit that the present proceedings continue to raise substantial issues concerning compliance with the Delhi Preservation of Trees Act, 1994, environmental safeguards, transplantation efficacy, compensatory afforestation and protection of urban biodiversity, all of which remain fully within the jurisdiction of this Hon'ble Tribunal.
  
42. It is reiterated that the judgment dated 20.03.2026 cannot be read as dispensing with compliance under applicable environmental statutes or as granting unrestricted authority to undertake indiscriminate tree felling and ecological disturbance.
  
43. The Applicants therefore respectfully submit that the Additional Affidavit filed by Respondent No.1 does not answer the substantial environmental concerns raised in the present proceedings and instead selectively relies upon portions of the judgment dated 20.03.2026 while suppressing the continuing statutory obligations and safeguards expressly preserved therein.
  
44. In the circumstances, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to allow the instant Original Application.

Pass any other such order as this Hon'ble Court may deem fit and proper in the premises of this case.



**APPLICANT NO. 2**

Through:



Ankur Sood  
D/485/2007  
Advocate for the Applicant  
A -19, (L.G.F.) Pamposh Enclave  
Greater Kailash - 1  
New Delhi - 110048  
Email - ankursoodoffice@gmail.com  
Mobile No. 9810088832

Place: New Delhi  
Date: 20.05.2026

**BEFORE THE NATIONAL GREEN TRIBUNAL AT NEW  
DELHI  
MEMORANDUM OF APPLICATION  
(Under Section 18(1) read with Section 14 and 15 of the  
National Green Tribunal Act, 2010)**

**Original Application No. 227 of 2025**

**In the Matter of:**

Naveen Solanki and Anr.

...Applicants

Versus

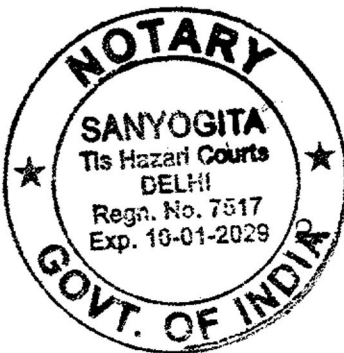
Rail Land Development Authority and Ors. ...Respondents

**VERIFYING AFFIDAVIT**

I, Ajay Harish Joshi; S/o S/o Late Shri Maj. Gen. Harish Chandra Joshi, aged about 59 years, R/o, 101, Mandakini Enclave, Alaknanda, New Delhi-110019, do hereby solemnly affirm and state as under-

1. That I am Applicant No. 2. I am fully conversant with the facts and circumstances of the case am, therefore competent to affirm this Affidavit.

That I have read the accompanying Reply to Additional Affidavit and have understood the contents thereof



and I say that the same has been drafted under my instructions.

3. That the contents of the accompanying Reply to Additional Affidavit are within my personal knowledge and are based on information received by me which I believe to be true.

*Ajay Joshi*

**DEPONENT**

**18 MAY 2026**

**VERIFICATION**

Verified at New Delhi on this 18 day of May, 2026 that the contents of my above affidavit are true and correct to the best of my knowledge, no part of it is false and nothing material has been concealed therefrom.

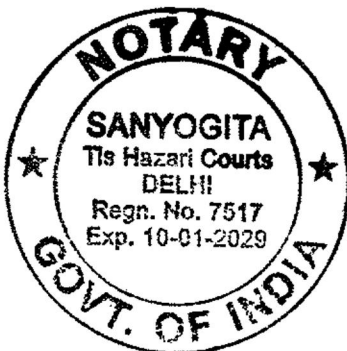
*Ajay Joshi*

**DEPONENT**

**18 MAY 2026**

**ATTESTED**

**NOTARY PUBLIC  
DELHI (INDIA)**



**COMPILATION OF PICTURES OF DEFORESTATION ON  
THE SUBJECT LAND  
DATE: 19.01.2026**



*Arjun Singh*

//TRUE COPY//



*Arshad Javed*

//TRUE COPY//



*Arshad Javed*

//TRUE COPY//



*Arhus Land*

//TRUE COPY//



*Arshad Javed*

//TRUE COPY//



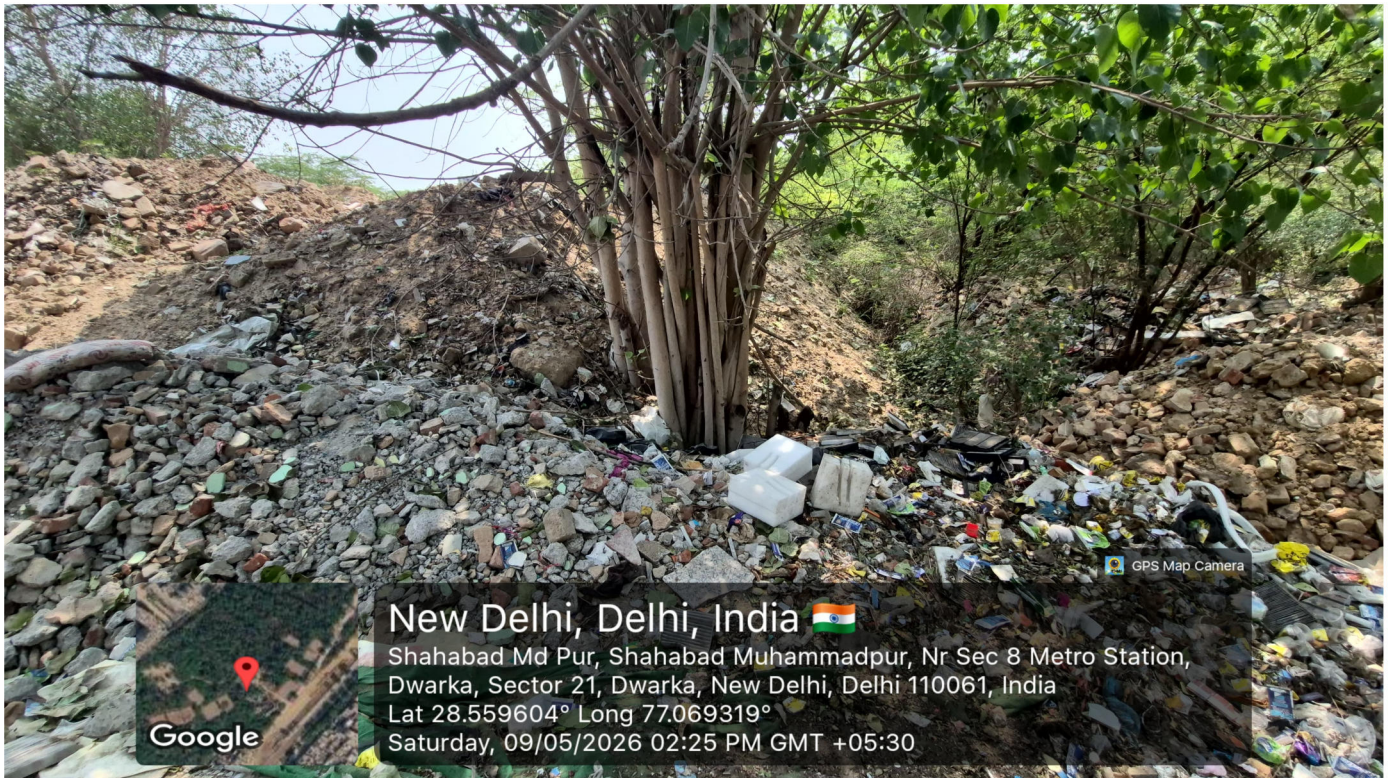
*Arshad Javed*

//TRUE COPY//



*Arshad Jafar*

//TRUE COPY//



*Arshad Javed*

//TRUE COPY//

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Ankur Sood &lt;ankursoodoffice@gmail.com&gt;

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**Advance Service of Reply to Additional Affidavit filed by R1 in O.A. 227/2025 (NGT)**

1 message

**Ankur Sood** <ankursoodoffice@gmail.com>

20 May 2026 at 11:51

To: juvas.rawal@zeus.firm.in, jmalawoffices@gmail.com, Anuj Bhandari &lt;anujbhandari123@gmail.com&gt;, crb@rb.railnet.gov.in, secy-moef@nic.in

Dear All,

PFA the Reply to the Additional Affidavit being filed on behalf of the Respondent No. 1. The NDOH is 21.05.2026.

Warm Regards,  
Ankur Sood,  
Counsel for the Applicant

--

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**Reply to Additional Affidavit.pdf**

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