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**THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
(UNDER SECTION 16 OF THE NATIONAL GREEN**

TRIBUNAL ACT, 2010)

I.A. NO. 146 OF 2025

IN

APPEAL NO. 19 OF 2025

IN THE MATTER OF:

Rajeev Ranjan

...Appellant

Versus

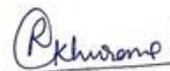
Ministry of Environment, Forest &

Climate Change & Ors.

...Respondents

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THROUGH



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Date: 27.10.2025

Place: New Delhi

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**REPLY ON BEHALF OF RESPONDENT NO. 3, TO THE
CONDONATION OF DELAY APPLICATION FILED BY THE
APPELLANT/APPLICANT ALONG WITH AFFIDAVIT**

1. The present Appeal has been filed by the Appellant under section 16(h) of the National Green Tribunal Act, 2010 (“NGT Act”) challenging the grant of Environmental Clearance (“EC”) dated 13.01.2025 to the Respondent No. 3, M/s R R Texknit LLP for construction of luxury flats at Khasra No. 1230/2, Sector-B, Pocket-1, Vasant Kunj, New Delhi-110070.
2. That the present Application has been filed by the Appellant (“Applicant”) seeking condonation for delay of 13 days in filing the Appeal. The Answering Respondent submits that the Application is devoid of any merits and is liable to be dismissed.

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3. The conjectures made by the Applicant in the present I.A. are without any sufficient cause and evidences. The grounds advanced by the Applicant for the delay, including the alleged time taken for compilation of documents by the Appellant, and further drafting, collection and collation of documents, and draft approvals, do not constitute sufficient cause under the law for condonation of delay. The reason for delay is attributable to the Appellant's internal inefficiencies, which cannot be treated as valid reasons for condonation.

PARA WISE REPLY

4. The contents of paragraph 1 are a matter of fact and record, and same does not mandate any reply.
5. The contents of paragraph 2 and 3 except for the facts about the Appellant, are vague, insufficient and based upon the personal knowledge of the Appellant thus, do not form sufficient cause for the delay. The Appellant himself mentions that he is a retired Senior Bureaucrat therefore, it is deemed that the Appellant possesses enough skill and knowledge to have filed the Appeal under the limitation period.
6. The contents of paragraph 4 are lack merit as there is no evidence to support the claim of the Appellant. Moreover, the Appellant being a senior citizen does not itself make for a sufficient cause to delay the filing of an Appeal.

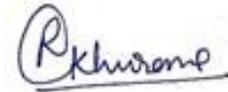
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7. The contents of paragraph 5 are denied as these are mere procedural assertions without comprising of any sufficient cause for the delay in filing this Appeal.
8. The contents of paragraph 6 are denied *in toto*. It is denied that the delay of 13 days was unintentional or caused by bona fide circumstances. The Applicant's negligence in pursuing remedies and delaying filing for being a senior citizen cannot be considered a sufficient cause for condonation of delay.
9. The contents of paragraph 7 are denied as the Applicant has not provided any sufficient cause for the delay and has not furnished any evidence to support his cause of delay.
10. The assertions made by the Applicant in paragraph 8 are denied. It is submitted that condoning the delay would prejudice the Respondent No. 3 and undermine the statutory scheme of strict adherence to limitation periods. The claim that no prejudice will be caused to the Respondents is unfounded.
11. That the assertion made in paragraph 9 by the Applicant are denied. It is submitted that the present Application is an attempt to justify the Appellant's lack of diligence in pursuing legal remedies and does not serve the interest of justice.

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Reply to Prayer:

- A. Dismiss the Application for Condonation of Delay, as it lacks sufficient cause and fails to meet the statutory timeline established under law; and
- B. Pass such other or further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.

THROUGH**RAHUL KHURANA Adv**

Counsel for the Respondent No. 3

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Email: rkhuranalegal@gmail.com

Date: 27.10.2025

Place: New Delhi

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BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH NEW DELHI

APPEAL NO. 19/2025
IA No. 146 of 2025

In the matter of:
Rajeev Ranjan

...Appellant

Versus

Ministry of Environment, Forest and Climate Change and Ors.

Respondents

AFFIDAVIT

I, Rakesh Kumar Sharma S/o Late Sh. Hari Shankar Sharma R/o 137 Jor Bagh, Lodi Road, New Delhi 110003, the Partner of M/S RR Texnit, Respondent no.3, do hereby solemnly affirm and declare as under:

- 1. That I am the Partner of the Answering Respondent no. M/S RR Texnit in the subject matter Appeal and thus acquainted with facts and circumstances of the case and thus competent to swear this affidavit.
- 2. That the accompanying Reply ^{to the IA} has been drafted under my instructions and contents thereof have been read over and explained to me in my vernacular which are true and correct to my knowledge, the contents thereof may kindly be read as part and parcel to this affidavit also and not repeated herein.
- 3. That the contents as stated above are true and correct to my knowledge and belief.

Deponent has signed in my presence

27 OCT 2025

For R R TEXKNIT LLP

Rakesh Kumar Sharma
DEPONENT Signatory

VERIFICATION

It is verified at _____ on _____ that the contents of the present Affidavit are true and correct and nothing has been concealed therefrom.



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

It as correct *AKS* Notary DELHI

DEPONENT

For R R TEXKNIT LLP

Rakesh Kumar Sharma
Authorised Signatory

27 OCT 2025