

**IN THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI.
ORIGINAL APPLICATION NO. 425 OF 2022**

IN THE MATTER OF :

M.C. DWIVEDI

....APPLICANT

VERSUS

STATE OF UTTAR PRADESH AND OTHERS.

...RESPONDENTS

INDEX OF PAPERS

SR. NO.	PARTICULARS	PAGE NO.
1.	REPLY ON BEHALF OF RESPONDENT NO 6., MOHD. JUBAIR, PROPRIETOR OF M/S DIAMOND BRICKS	1-7
2.	ANNEXURE – R6-1 COPY OF THE CONSENT ORDER ISSUED BY UPPCB	8-10
3.	ANNEXURE-R6-2 COPY OF GST REGISTRATION CERTIFICATE	11-13
4.	ANNEXURE -R6-3 COPY OF THE UTTAR PRADESH BRICK KILNS (SITING CRITERIA FOR ESTABLISHMENT) 2012	14-17
5.	VAKALATNAMA	18

Shireen Khan FILED BY
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**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO.425 OF 2022**

IN THE MATTER OF:

M.C DWIVEDI

...APPLICANT

VERSUS

STATE OF U.P. & ORS

...RESPONDENTS

**REPLY ON BEHALF OF RESPONDENT NO 6., MOHD. JUBAIR,
PROPRIETOR OF M/S DIAMOND BRICKS**

1. I, Mohd Jubair, S/o Sh. Sattar Mohammad, Aged about__ years, R/O 39, near Masjid dawatulhaq, Sujawalpur, Kasganj, Gunjundwara, Uttar Pradesh- 207242, do hereby solemnly affirm and declare as under :
2. That I am the Proprietor of M/s Diamond Bricks, am fully conversant with the facts of the case and competent to swear this affidavit.

PRELIMINARY SUBMISSIONS:

3. It is submitted that the Respondent No. 6 is the Proprietor of M/s Diamond Brick kiln and such is well acquainted with the facts of the complaint letter. As the issues pertains to the M/s Diamond Brick Kiln located in Chhitoni Bus Stop, Chhitoni, Post Ganjundwara, Chhitoni, Kasganj, Uttar Pradesh, and Applicants

Mango Orchard located in Ramchiton village, Tehsil Sahawar, District Kasganj.

4. At the outset, it is submitted that present complaint is a motivated one and the letter petition has been filed by the M.C Dwivedi, who is a Residence of D-1/1203, Vasant Kunj, New Delhi-110070. The Applicant in his complaint alleged that pollution is being caused by the Brick kiln on his Mango Orchard spread over 6 acres of land adjacent to the village.
5. The applicant held that pollution of air and water, and disposal of hazardous waste has reduced the yield and quality of mangoes growing in his Mango Orchard adjacent to the village.
6. The applicant further alleged that the Brick kiln is running without any permission and operating without the consent from the Uttar Pradesh Pollution Control Board.
7. It is submitted that the Respondent No. 6 received a show cause notice on 02.09.2022. Respondent No. 6 submits that the Diamond Bricks have Consent order issued dated 17.12.2020 by Uttar Pradesh Pollution Control Board, which has validity till 31.07.2027. Copy of the Consent Order issued by UPPCB is annexed herewith as ANNEXURE-R 6- 1.
8. That the Respondent No. 6 submits that the Brick Kiln is not operative as Respondent No. 6 suffered great loss during Covid pandemic and the same has been closed from considerable amount of time. It is pertinent to note that at the time of the Inspection dated 31.08.2022, Mr. Atar Singh (Choukidar) was present as a

representative of the Committee, who in turn found the Brick Kiln to be inoperative.

9. That the GST Registration Certificate of M/s Diamond Bricks Field having Registration Number 09AQOPJ5861A3ZO shows the location of the M/s Diamond Bricks to be Chhitoni Bus Stop, Chhitoni, Post Ganjdundwara, Chhitoni Kasganj, Uttar Pradesh. Copy of GST Registration Certificate is annexed herewith as ANNEXURE- R6- 2.

10. That as per The Uttar Pradesh Brick Kilns(Siting Criteria For Establishment) 2012, Rule 2(vii) as under:-

“brick kiln should not be allowed to install in the ‘Buffer zone’ of a notified fruit belt area as defined in ‘The Uttar Pradesh Promotion and Protection of Fruit Trees(Regulation of Harmful Establishments and Housing Schemes) Act,1985’ and the restriction made by competent authority concerned or decision of court on case to case basis, if any.

Distance from sides of mango orchard/Mixed fruits (mango and other) orchard (having at least 100 fruiting trees) joint nursery from brick kiln shall not be less than 800 meters in each direction. The mentioned distances are applicable irrespective of the variety/type of fruit area individually or collectively should not be less than 2.5 acre. Distance will be measured form the chimney of the

brick kiln to the first/ nearest row of the tree of mango/fruit orchard towards the kiln.

The Respondent No. 6 submits that the Brick Kiln is located about 1 km from the Mango Orchard. That the Respondent No. 6 had not violated any law and the Applicant has moved the Application with ulterior motives and malafide intent. Copy of The Uttar Pradesh Brick Kilns (Siting Criteria For Establishment) 2012 is annexed herewith as ANNEXURE-R6 - 3.

11. That Respondent no. 4 has complied with all the conditions mentioned in the Stop working notice and also strictly abide by rules and regulations issued by UPPCB.
12. Respondent crave leave to refer to submit additional documents at the time of arguments.

ON MERITS

PARAWISE COMMENTS

1. That in reply to the para 1 are denied for want of knowledge as the Respondent No. 6 is unaware of the orchids owned by the Applicant, and that the Applicant should be put to strict proof of the same.
2. That in reply to the para 2 are denied for want of knowledge as the Respondent No. 6 is unaware of the orchids owned by the Applicant, and that the Applicant should be put to strict proof of the same.
3. That in reply to para 3, it is submitted that Applicant has made wrong contention that due to Brick kiln, the yield and quality of the

mangoes are reduced without any proof. It is submitted that the Brick Kiln is inoperative and thus it does not cause any wastage to pollute the Applicant's Orchard or the surrounding area.

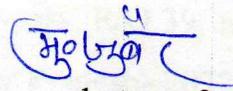
4. That the contents of para 4, being false, wrong and hence denied by the Respondent No. 6. The Consent Order issued by the competent authority i.e. UPPCB is valid till 31.07.2027. The Respondent No. 6 vehemently denies the contention of the Applicant.
5. That the content of the para 5 is denied for being false and misconstrued as the Applicant had no proof that the Respondent no. 3 do not follow the guidelines issued by the UPPCB and Hon'ble Supreme Court of India. As submitted above the Diamond Brick Kiln is about 1 Km far from the Applicant's Orchard and moreover the Brick Kiln is inoperative hence no violation of rules can be shown by the Applicant.
6. That the content of para 6 is denied for want of knowledge by the Respondent No. 6 the contents of the para 6 are not repeated herein for the sake of brevity. It is submitted that these allegations are made without any basis and with ulterior motives.

PRAYER

- a). It is therefore most respectfully prayed by the Respondent no. 3 may kindly dismiss the present Original Application filed by the Petitioner;
- b). any other order which this Hon'ble Court may deem fit and proper in the facts and circumstances of the case may be passed.

Kasganj

Dated : 17.04.2023


Respondent no. 3

Through

(Ali Muzaffar & Shireen F Khan)

Advocate for Respondent no. 3

40/121, LGF, Pocket 40

C.R. Park, New Delhi-110019

Mobile- 9599715315

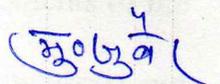
Email:advocateshireenkhan@gmail.com

Kasganj

Date: 17.04.2023

VERIFICATION

Verified at Delhi on this 17th Day of April, 2023 that the statement of facts contained in the Reply to the Original Application are true and correct to our knowledge and the statements of law contained therein are true upon legal information received and believed to be true, No part of it is incorrect and nothing material has been kept concealed therefrom.


DEPONENT



BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO.425 OF 2022



IN THE MATTER OF:

M.C DWIVEDI

...APPLICANT

VERSUS

STATE OF U.P. & ORS

...RESPONDENTS

AFFIDAVIT

I, Mohd Jubair, S/o Sh. Sattar Mohammad, Aged about ___ years, R/O 39, near Masjid dawatulhaq, Sujawalpur, Kasganj, Gunjundwara, Uttar Pradesh- 207242, do hereby solemnly affirm and declare as under :

1. That I am the Respondent no. 6 in the abovementioned case and am well conversant with the facts and circumstances of the case. I am also otherwise competent to swear this affidavit.
- 2. That the statement of facts contained in Paras 1 to 12 of the Reply to the Original Application are true and correct to my knowledge and the statements of law contained therein are true upon legal information received and believed to be true.

Deponent

Verification

Verified at Kasganj on this 17th Day of April 2023, that the contents of the above affidavit are true and correct to my knowledge, no part of it is incorrect and nothing material has been kept concealed therefrom.

Afsar Khan

Deponent



Uttar Pradesh Pollution Control Board

Building. No TC-12V Vibhuti Khand, Gomti Nagar, Lucknow-226010

Phone:0522-2720828,2720831, Fax:0522-2720764, Email: info@uppcb.in, Website: www.uppcb.com

172290/UPPCB/Aligarh(UPPCBRO)/CTO/both/MANYAVAR
KANSHIRAM NAGAR /2022

Date: 17/12/2022

To,

M/s

DIAMOND BRICKS FIELD

CHHITONI BUS STOP, CHHITONI POST GANJDUNDWARA,
KASGANJ, KASGANJ, 207242

Application Id-
18971353

Consolidated Consent to Operate and Authorisation hereinafter referred to as the CCA (Consolidated Consent & authorization) (Fresh) under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981

CCA is hereby granted to DIAMOND BRICKS FIELD located at CHHITONI BUS STOP, CHHITONI POST GANJDUNDWARA, KASGANJ, KASGANJ, 207242. subject to the provisions of the Water Act, Air Act and the orders that may be made further and subject to following terms and conditions :-

1. This CCA DIAMOND BRICKS FIELD granted for the period from 15/12/2022 to 31/07/2027 and valid for manufacturing of following products.

S No	Product	Quantity	Unit
1	BRICK	20000	Numbers/Day

2. Conditions under Water (Prevention and Control of Pollution) Act -1974 as amended :-

(i) The daily quantity of effluent discharge (KLD) :-

Kind of Effluent	Quantity(KLD)	Treatment facility	Discharge point
Domestic	1.6 KLD	Septic Tank	

(ii) Trade Effluent Treatment and Disposal :- The applicant shall operate Effluent Treatment Plant consisting of primary/secondary and tertiary treatment as is required with reference to influent quantity and quality.

In case of stoppage of functioning of ETP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

(iii) The treated effluent shall be recycled to the maximum extent and should be reused within the premises for gardening etc. Quality of the treated effluent shall meet to the following general and specific standards as prescribed under Environment (Protection) Rules, 1986 and applicable to the unit from time-to-time :-

Industrial Effluent Quality Standard

S.No.	Parameter	Standard
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(iv) Sewage Treatment and Disposal :- The applicant shall provide comprehensive STP as is required with reference to influent quantity and quality. In case of stoppage of functioning of STP, production has to be stopped immediately and this Board has to be intimated by fax/phone/email with a report in this regard to be dispatched immediately.

8. If the unit uses the ground water and requires the permission from SGWA/CGWA for water abstraction then the industry will have to obtain No objection certificate for abstraction of ground water. It will be the responsibility of the industry to comply with the various conditions of the NOC obtained from the competent authority and submit to the Board, within 3 months time failing which CTO will be revoked.

General Conditions:-

1. The applicant shall get analysed the samples of effluent/emission/hazardous wastes at least once in a three month from the laboratory recognized by the MoEF and shall report to the UPPCB.
2. The applicant shall however, not without the prior consent of the Board bring into use any new or altered outlet for the discharge of effluent or gases emission or sewage waste from the unit.
3. Treated Industrial waste water and domestic waste water shall be disposed jointly at one disposal point. The applicant shall provide discharge measurement equipment at final disposal point.
4. The applicant shall strictly comply with conditions of this CCA and submit compliance report of stipulated conditions within 30 days of receipt of this CCA. If at any point of time, it is found that the industry is not complying with stipulated conditions or any further direction/instruction issued by the Board, legal action shall be initiated against the applicant.
5. The applicant shall maintain good house keeping. All valves/pipes/sewer/drains etc. must be leak-proof
6. The industry shall provide uninterrupted entry to the STP/ETP inlet and outlet points, Air Pollution Control equipment and stack for smooth sampling/monitoring of efficiency of pollution control systems.
7. The industry shall provide Inspection Book at the time of inspection to the Board's officials.
8. Whenever due to any accident or other unforeseen act or event, such emission occurs or is apprehended to occur in excess of standards laid down, such information shall be reported to the Board's offices and all other concerned offices. In case of failure of pollution control equipment, the production process connected to it shall be stopped with immediate effect.
9. The industry shall operate in a manner so that all emissions be emitted through designated chimney/stack only.
10. In case of any damage to the agriculture productivity, human habitation etc. by the operation of industry, it shall be imperative to stop production in the industry with immediate effect and such information shall be reported to Board's offices. The industry shall be liable to pay compensation also in such cases as decided by the Competent Authority.
11. The applicant shall apply before the 60 days of expiry of CCA or any change in production types/production capacity/manufacturing process/capacity enhancement etc. or any change in effluent discharge point or emission point
12. The Board reserves the right to revoke/add/modify any stipulated condition issued along with CCA, as may be necessary.

Specific Conditions:-

On the basis of observations made in Inspection report dated 17.12.2022 of for this consent to operate is granted for M/s Diamond Brick Field] Chhitauni Bus Stand, Chhitauni, Ganjdundwara, Distt. Kasganj. Recommended for grant of conditional consent (Water & Air) for valid upto period of dated 31.07.2027 for manufacturing 20,000 Bricks/Day with following special conditions :-

1. This consent is granted for M/s Diamond Brick Field] Chhitauni Bus Stand, Chhitauni, Ganjdundwara, Distt. Kasganj.
2. This consent is depend on order of Hon;ble National Green Tribunal O.A. No. 253/2021, in which it is mandatory that order of the Hon;ble Supreme Court/High Court/Nation Green Tribunal orders passed for NCR Region will also be applicable for Brick Kilns for District Aligarh. Owners of the Brick Kilns shall insure to comply the every point of the said Order. Otherwise this consent shall be assumed as revoked or cancelled.

JAI PAL Digitally signed
by JAI PAL SINGH
Date: 2022.12.17
18:56:54 +05'30'
SINGH

**JAIPAL SINGH
REGIONAL OFFICER (I)**

Copy to:

Chief Environment Officer, C-4, U.P. Pollution Control Board, Lucknow.

JAI PAL Digitally signed
by JAI PAL
SINGH
Date: 2022.12.17
18:57:11 +05'30'
SINGH

**JAIPAL SINGH
REGIONAL OFFICER (I)**



Government of India
Form GST REG-06
[See Rule 10(1)]

Registration Certificate

Registration Number : 09AQOPJ5861A3ZO

1.	Legal Name	MOHD JUBAIR			
2.	Trade Name, if any	DIAMOND BRICKS FIELD			
3.	Constitution of Business	Proprietorship			
4.	Address of Principal Place of Business	Chhitoni Bus Stop, Chhitoni, POST GANJDUNDWARA, Chhitoni, Kasganj, Uttar Pradesh, 207242			
5.	Date of Liability	24/04/2022			
6.	Period of Validity	From	24/04/2022	To	Not Applicable
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority	Centre			
Signature					
Signature Not Verified Digitally signed by DS GOODS AND SERVICES TAX NETWORK(4) Date: 2022.04.26 15:45:33 IST					
Name		Rakesh Kumar Verma			
Designation		Superintendent			
Jurisdictional Office		Kashiram Nagar Sector-2			
9. Date of issue of Certificate		26/04/2022			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

This is a system generated digitally signed Registration Certificate issued based on the approval of application granted on 26/04/2022 by the jurisdictional authority.



सत्यमेव जयते

Annexure A

GSTIN

09AQOPJ5861A3ZO

Legal Name

MOHD JUBAIR

Trade Name, if any

DIAMOND BRICKS FIELD

Details of Additional Places of Business

Total Number of Additional Places of Business in the State 0



सत्यमेव जयते

Annexure B

GSTIN

09AQOPJ5861A3ZO

Legal Name

MOHD JUBAIR

Trade Name, if any

DIAMOND BRICKS FIELD

Details of Proprietor

1



Name

MOHD JUBAIR

Designation/Status

PROPRIETOR

Resident of State

Uttar Pradesh

**Uttar Pradesh Sashan,
Paryavarn Anubhag.**

In pursuance of the provisions of the clause(3) of article 348 of the constitution, the Governor is pleased to order the publication of the following English translation of notification no. 921/55-i;kZ/12-94¼i;kZ½-11, dated June 27,2012

NO. 921/55-i;kZ/12-94¼i;kZ½-11

Dated Lucknow,June 27, 2012

In exercise of the powers under sub section (1) of section 54 read with clause (z) of sub section (2) of the said section and sub section (1) of section 21 of the Air (Prevention And Control of Pollution) Act,1981 (Act no.14 of 1981) the Governor, after consultation with Uttar Pradesh Pollution Control Board and after considering the objections and suggestions received from concerned person, is pleased to make the following rules with a view to regulating the siting criteria for the establishment of new brick kilns in the State of Uttar Pradesh:-

**THE UTTAR PRADESH BRICK KILNS(SITING CRITERIA FOR ESTABLISHMENT)
RULES,2012**

Short title and commencement	1. (1)	These rules may be called the Uttar Pradesh Brick kilns (Siting Criteria For Establishment) Rules,2012
	(2)	They shall come into force with effect from the date of their publication in the Gazette.
Distance from residential area/population/sensitive area/mango or fruit orchard.	2.	Subject to provisions of the Uttar Pradesh Promotion and Protection of Fruit Trees (Regulation of Harmful Establishment and Housing Scheme Act, 1985 (U.P.Act No. 18 of 1985, a brick kiln shall not be established which does not fulfil the following conditions:-
	(i)	a brick kiln shall not be established with in a distance of 5.0 kilometers form the area of a Municipal Council or Municipal Corporation. Subject to the above restrictions a brick kiln shall be established at least 500 meters away from residential area having minimum population of 100-150 persons or 20 houses either kachha or pucca houses 1.0 kilometer from a residential area having population more than 150 persons or more than 20 houses whether kachha or pucca;
	(ii)	a brick kiln shall not be established at a place within the distance of 10. Kilometer from registered hospital, school public building, religious places or a place from where flammable substances are stored; a brick kiln shall not established within a radius of 5.0 kilometers in notified

sensitive areas of a zoo, wild life sanctuaries, historic monuments, museum and the like:

Provided that in case of Taj Trapezium zone are(T.T.Z.) the directions/guidelines given by the Supreme court from time to time, shall apply;

- (iii) a brick kiln shall not be established within a distance 200 meters from the sides of the railway tracks;
- (iv) a brick kiln shall not be established within a distance of 300 meters from both sides of the National and State Highways;
- (v) a brick kiln shall not be established within a distance of 100 meters from both sides of a main district road /public works department roads;
- (vi) a brick kiln shall not be established within 800 meters from a brick kiln already established;
- (vii) a brick kiln should not be allowed to install in the 'Buffer zone' of a notified fruit belt area as defined in 'The Uttar Pradesh Promotion and Protection of Fruit Trees(Regulation of Harmful Establishments and Housing Schemes) Act,1985' and the restriction made by competent authority concerned or decision of court on case to case basis, if any.

Distance from sides of mango orchard/Mixed fruits (mango and other) orchard (having at least 100 fruiting trees) joint nursery from brick kiln shall not be less than 800 meters in each direction. The mentioned distances are applicable irrespective of the variety/type of fruit area individually or collectively should not be less than 2.5 acre.

Distance will be measured from the chimney of the brick kiln to the first/ nearest row of the tree of mango/fruit orchard towards the kiln.

3. No license in respect of firing of brick kiln or for mining lease shall be granted by the Zila Panchayat/concerned district administration until and unless a valid previous consent (NOC) is obtained by the owner of the brick kiln,
- Permission for the establishment of the brick kiln

issued by the State Board.

- | | |
|---|--|
| Emission Standards | <p>4. The emission standards and Pollution Control System including height of Chimney for Brick Kilns as notified by Ministry of Environment and Forest (MOEF) Government of India vide serial no. 74 of schedule I in notification no. GSR 543 (E) dated 22nd July,2009 shall be applicable in case of Brick Kiln, issued under the Environment (Protection) rules,1986.</p> |
| Materials to be used in Brick Kilns | <p>5. The following materials may be used in Brick Kiln established under these Rules:-</p> <ul style="list-style-type: none"> (a) Local agro industrial waste residue to replace coal as internal fuel such as cotton stalk, mustard stalk etc; (b) Non hazardous waste such as stone dust, rice husk ash, red mud etc. may be mixed with top soil; (c) Fly ash in brick moulding in compliance with the notification issued under the Environment (Protection) Act,1986 as applicable; <p style="padding-left: 40px;">Provided that the spent organic, solvent, oily residue, pet coke, filter press cake(hazardous waste) and other waste such as plastic rubber, leather shall not be used as fuel in the brick Kiln.</p> |
| Duties of the proprietor of a Brick Kiln. | <p>6.(1) Multi layer and multi storey green belt of 10 meters width shall be constructed along the periphery of brick kiln leaving two 10 meters wide gaps in the boundary for entry and exit of material and vehicles. A wall of 3 meters height shall be constructed on the sides where land is not available for green belt development to prevent fugitive dust emission. For installation of brick Kiln with green belt development, the minimum area required is 2.0 acre.</p> <p>(2) Lighting arrestor as per the PWD norms or any other standard desing shall be installed for brick Kiln to avoid the damage to stacks/chimney caused due to lighting attack.</p> <p>(3) In Brick Kiln besides the above Good House keeping practices including disposal of coal, ash, provision of</p> |

double wall around the Kiln, proper layout Brick lining of passage use of properly grades coal, proper firing practices, protection from noise pollution and other measures should be followed by all Brick Kiln Owners.

- (4) While digging the earth for making bricks in the area ear marked for the same, the straight cutting of earth should be avoided; instead the cutting should be done in a slanted manner in the proportion of 1:3, so that there should be minimum soil erosion of the agricultural land.

Permission for operation of the brick Kiln.

7. A person who want to operate a brick Kiln shall make an application with requisite fee separately to the State Board by furnishing mining lease from district administration, permission for firing from Zila Panchayat/Zila Parishad and no objection certificate/License as the case may be from the Horticulture Department, under the Uttar Pradesh Air(Prevention and Control of Pollution) Rules,1983,and the Uttar Pradesh Water (Consent for discharge of sewage and Trade Effluent) Rules,1981, for the permission for the operation of the brick Kiln. On receipt of such application the State Board may reject such permission after necessary enquiry as prescribed under the aforesaid Rules.

Provided that a brick Kiln which was established/operate previously but not being operative in the last season, want to operate or change the name/ownership and have valid consent under the Air (Prevention and Control of Pollution) Act, 1981 and the Water (Prevention and Control of Pollution) Act, 1974 may operate the same if it informs in writing to the State Board but shall be bound to comply with all the conditions subject to which consent was granted.

C.C. No.

FIR No.

U/S

P.S.

IN THE COURT OF NATIONAL GREEN TRIBUNAL, PRINCIPAL
BENCH, NEW DELHI

Suit / Appeal No.

In re :-

M.C. Dwivedi

ORIGINAL APPLICATION No. 425/2022

JURISDICTION OF 2022

VERSUS

State of UP & Des.

Plaintiff(s) Or Petitioner(s)
Appellant(s) Or Complainant(s)

KNOW ALL to whom these present shall come that I/ We Mr. Mohammad Adil Khan, P/o
Sultan, near kadi masjid, Sujawalpur, Kasganj, UP, Dumees of Ujala Beicks
Defendant(s) / Respondent(s) / Accused

The above named

Respondent no. 6

ALI MUZAFFAR CD/3917/19
SHIREEN F. KHAN (MAH/927/2014)
BANIST E JAHAN
(Advocates)

do hereby appoint



I/We authorize him:-
to appear in the above-noted case in this court or in any other court in which the same may be tried
including High court subject to payment of fees separately for each court by me/us
to file and present pleadings, appeals cross-objections or petitions for
writ, compromise or other petitions or affidavits or other
necessary or proper for the prosecution of the said case in all its
stages.

I/We authorize him:-
to admit and/or deny the documents or opposite party
in the said case or submit to arbitration any differences or
disputes in any manner relating to the said case.
I/We authorize him:-
to pay money, cheques, case and grant receipts hereof and to
do any other thing which may be necessary to be done for the progress and in the
interest of the said case.

I/We authorize him:-
to exercise the power and authority hereby
granted to him to sign the power of attorney on our behalf.
I/We or my/our duly authorised agent would appear in court and all hearings
and proceedings in the said case and above Court. I/We hereby agree that once the fee is
paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for
more than 3 years the original fee shall be paid again by me/us

I/We hereby agree that in the event of the whole or part of the fee agreed by me/us to be
paid he shall be entitled to withdraw from the prosecution of the said case until the
fee is paid only for the above case and above Court. I/We hereby agree that once the fee is
paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for
more than 3 years the original fee shall be paid again by me/us

I/We do hereunto set my/our hand to these presents the contents of which have
been understood by me/us on this day of 2023

27th

Feb.

2023

Bahish Jahan
Advocate

Shireen Khan

I Identify the Signature/Thumb Impression of the Below Mentioned Person,

Who Has been Signed in my presence. The Client.

Mr. Mohammad Adil Khan
Client