

BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,  
NEW DELHI  
OA 809/2022

JAN SEVA WELFARE SOCIETY

...APPLICANT

Vs

GOVERNMENT OF NCT OF DELHI & ORS.

...RESPONDENTS

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NDH 22.03.2023

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FILED BY:



[R.S. PRABHU & CO.]  
J-15, JANGPUR EXTENSION,  
NEW DELHI – 110014  
MOBILE NO.8851382791  
Email. Id. office@rsprabhu.com

NEW DELHI  
DATED: 20.03.2023



Welfare Society (“**the Applicant**” or “**Applicant Society**”) and states that nothing therein should be treated as true or correct unless specifically admitted herein. No part of the Original Application may be deemed to be admitted merely by reason of specific non-traverse.

### **Brief Background of the Dispute**

3. On 03.09.2014, the Delhi Development Authority carried out an e-auction sites for the purpose of inviting tenders for establishment of Mobile Towers (GBM/RTT/GBT) in various locations across the National Capital Territory of New Delhi.
4. Vide E-Tender No. 128, E-Tender No. 209, E-Tender No. 214 and E-Tender No. 215 dated 26.02.2015, 02.03.2015 and 24.09.2015, Respondent No. 7 was allotted locations in District Park Pitampura, District Park Sandesh Vihar, Pitampura, NHP between Chander Lok and Vihar, Pitampura and DDA Park, Pushpanjali, New Delhi. The towers were duly established by RJIL at the allotted locations and have since been operating in strict compliance with all applicable laws.

5. It is understood that in and around May 2021, a complaint was made by one Shri. Jai Bhagwan Agarwal to Respondent No. 3 in regard to the installation of the towers in the aforementioned locations.
6. It is understood that vide letter bearing no. F2(2)2021-22/Hort.-II/DDA/554 the Deputy Director/Horticulture Division-2 responded to Sh. Jai Bhagwan Agarwal in response to the complaint dated 11.05.2021 stating that the permission to establish the mobile towers was granted by higher authorities as far back as in the year 2015 as per applicable regulations.
7. This Hon'ble Tribunal in O.A No. 232 of 2022 titled *Gautam Nagar Residents Association Regd V. Commissioner SDMC & Ors.* passed an order on 19.07.2022 directing the Delhi Pollution Control Committee and the Commissioner, Municipal Corporation to take remedial action to ensure that the park is not used for any "non-conforming purposes" and held the following: -

*"In view of the above, the DPCC may take further action for compliance of environmental norms by exercising its coercive measures. Apart from the*

*DPCC, the Commissioner, Municipal Corporation, Delhi has also to take remedial action in the matter to ensure that the park is not used for any non-conforming purposes. If necessary, the said Authorities may take Police help for execution of this order.”*

8. Placing reliance on the order passed by this Hon'ble Tribunal in O.A No. 232 of 2022, the Applicant abovenamed approached the Applicant Society to file the present suit.

### **Preliminary Submissions**

#### **A. The subject matter jurisdiction qua the present dispute does not vest with this Hon'ble Tribunal**

9. It is submitted that this Hon'ble Tribunal is not vested with the jurisdiction under Section 14 of the National Green Tribunal Act, 2010 (“**NGT Act**”) to entertain the present petition.
10. Section 14 of the NGT specifies the jurisdiction of this Hon'ble Tribunal and states as under:

*14. Tribunal to settle disputes.—(1) The Tribunal shall have the jurisdiction over all civil cases*

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*where a substantial question relating to environment (including enforcement of any legal right relating to environment), is involved and such question arises out of the implementation of the enactments specified in Schedule I.*

*(2) The Tribunal shall hear the disputes arising from the questions referred to in sub-section (1) and settle such disputes and pass order thereon.*

*(3) No application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute first arose:*

*Provided that the Tribunal may, if it is satisfied that the applicant was prevented by sufficient cause from filing the application within the said period, allow it to be filed within a further period not exceeding sixty days.*

11. The phrase “substantial question relating to environment” is defined in Section 2(m) as follows:

*where,—*

*(i) there is a direct violation of a specific statutory environmental obligation by a person by which,—*

*(A) the community at large other than an individual or group of individuals is affected or likely to be affected by the environmental consequences;*

*or*

*(B) the gravity of damage to the environment or property is substantial; or*

*(C) the damage to public health is broadly measurable;*

12. On a plain reading of Section 14, it is a *sine qua non* that in order for a civil dispute to come within the jurisdiction of this Hon'ble Tribunal, the subject matter of the *lis* must involve an alleged violation of a “*specific statutory environmental obligation*”, viz., an alleged breach of one of the enactments specified in Schedule I to the NGT Act. This issue is no longer *res integra* view of at least two judgments of the Full Bench of 5 Learned Members of this Hon'ble Tribunal in *Goa Foundation v. Union of India*, judgment dated 18.07.2013 in O.A No. 26 of 2012 and *Kalpavriksh v. Union of India*, judgment dated 17.07.2014 in Application No. 116 (THC) of 2013.

13. Relying on the larger bench decisions in *Goa Foundation (supra)* and *Kalpavriksh (supra)*, this

Hon'ble Tribunal in *Dr. Arvind Gupta v Union of India & Ors.*, O.A No. 61 of 2012 held:

29. .... It is clear that that Section 14 of the NGT Act would vest jurisdiction in the Tribunal in relation to the following: (i) all civil cases (ii) where a substantial question in relation to environment is raised (iii) enforcement of a legal right relating to environment (iv) it should arise out of the implementation of the enactments specified in schedule-I to the NGT Act, 2010.

30. **All these conditions have to be cumulatively satisfied in cases falling under either of the categories under head (ii) and (iii)....**"

(emphasis supplied)

14. It is therefore the settled position that this Hon'ble Tribunal would not exercise its jurisdiction over a civil dispute unless the same relates to implementation of, or an alleged violation of one of the legislations specified in Schedule I to the Act. A plain reading of the Application under reply would bring out that it is not even the case of the Applicant that the present case involves any violation of any of

the legislations in Schedule I to the NGT Act. The case of the Applicant is that permission for installation of mobile towers could not have been given by Respondent No. 1 to RJIL since the same would be contrary to the Master Plan. Even assuming (without conceding) the correctness of this allegation, no violation of any of the Schedule I Acts can be said to be made out. The jurisdictional fact necessary for a civil dispute to come within the subject matter jurisdiction of this Hon'ble Tribunal is therefore admittedly conspicuous by its absence in the present case.

15. There is no factual or legal basis on which it can be asserted that the establishment or operation of mobile towers raises any issue falling within the jurisdiction of this Hon'ble Tribunal. No trees are uprooted during the installation of a mobile tower. The tower is a temporary structure that can be removed from any location without leaving any lasting impression on the location on which it was installed. The mobile towers in issue are installed in the corners of the subject parks. The towers occupy only approximately 13.5 sq. meters in the periphery of the parks.

16. All aspects of the installation and operation of the towers stand comprehensively regulated by regulations issued by the Department of Telecommunications of the Government of India and the jurisdictional authorities such as Respondent No. 3. The permission for establishment was duly granted by the competent statutory authority in accordance with the powers granted to the Authority therein. The sole basis on which the Application has been filed is the misconception that there is a legal bar on the installation of mobile towers as per regulations issued by Respondent No. 3, which, as submitted above is without foundation, since as the regulations expressly permit such installations. It is not even the case of the Applicant that the operation of the subject mobile towers is in violation of any other rule or regulation issue by either the DoT or by any other jurisdictional authority.

17. No other environmental issue can be said to arise from the operation of mobile towers that would fall within the jurisdiction of this Hon'ble Tribunal. The lack of subject matter jurisdiction over the present *lis* stands decided by the judgment of this Hon'ble Tribunal in *Dr. Arvind Gupta (supra)*, which held:

*“33. In view of the above discussion, we are of the considered view that radiation i.e. emission of electromagnetic waves from the towers constructed by the respective respondents does not fall within the ambit, scope and jurisdiction vested in this Tribunal under the provisions of the NGT Act with reference Environment (Protection) Act, 1986.”*

18. It is therefore respectfully submitted that the present Application is liable to be dismissed as falling beyond the jurisdiction of this Hon'ble Tribunal under Section 14 of the NGT Act.

**B. No direction of the DDA or any other authority expressly prohibits the erection of a mobile tower in a park**

19. Without prejudice to the above, it is submitted that no applicable law, including any direction issued by the Delhi Development Authority or the Municipal Corporation of Delhi prohibits the establishment of a mobile tower in a residential area or any other public space.

))

20. To the contrary, the Municipal Corporation of Delhi (formerly the North Delhi Municipal Corporation) vide Resolution No. 120 dated 21.10.2021 approved the "*Policy for permission for installation of Mobile Towers on land/buildings/properties as well as rooftop properties of North DMC*", in which it specifically provides that mobile towers can be installed at public places, markets, **parks**, on road sides...". Applicable law therefore expressly contemplates that mobile towers can validly be installed in parks. It is respectfully submitted that the Applicant cannot validly invite the Hon'ble Tribunal to pass an order that would annul a validly granted permission issued by Respondent No. 3 strictly in terms of the applicable law, which expressly permits the installation of a tower in a park. There can be no dispute as to the position that this Hon'ble Tribunal cannot entertain a challenge to a policy enacted by Respondent No. 3 or any other competent statutory authority, not can it pass any order that would have the effect of quashing or overriding such Policy. The present Application is therefore plainly misconceived and without factual or legal foundation.

**C. The Hon'ble High Court of Delhi has stayed the order passed by the National Green Tribunal in O.A No. 232 of 2022**

21. The Application under Reply places heavy reliance on orders dated 19.07.2022 and 20.09.2022 passed by this Hon'ble Tribunal in O.A No. 323/2022 and Review Application No. 27/2022 respectively, by which this Hon'ble Tribunal had observed that no mobile tower can be allowed to be installed in a park and had directed MCD to take remedial action to ensure that the park is not used for any non-confirming purpose.

22. These orders were challenged by M/s. Indus Towers Ltd. in CM(M) 1380/2022 captioned *M/s. Indus Towers Ltd. v. Gautam Nagar Residents Association*, wherein the Hon'ble Delhi High Court was pleased to pass an interim order on 09.12.2022 staying the operation of the orders dated 19.07.2022 and 20.09.2022 passed by this Hon'ble Tribunal, holding:

*“13. ... it is clear that four-Member Bench of the Tribunal had categorically concluded after a detailed discussion on various aspects that the emission of electromagnetic waves from the*

*towers constructed by Institutions/Companies like the Petitioner and other similarly situated companies do not fall within the ambit, scope and jurisdiction vested in the Tribunal under the provisions of the NGT. This was rendered with reference to the Environment (Protection) Act, 1986.*

....

*18. ...it appears, prima facie, that the learned Tribunal has overlooked the law on the said subject and mis-directed itself while passing the impugned orders. The issue with respect to installation of the cell towers, the apprehension of ill-effects on health of human lives as well as the larger issue as to whether the Tribunal has any jurisdiction to pass any such order, as the impugned one, needs consideration”.*

23. The Supreme Court in *The State of Andhra Pradesh v Raghu Ramakrishna Raju Kanumuru*, 2022 8 SCC 156 held that “...it was not appropriate on part of the learned NGT to have continued with the proceedings before it, specifically, when it was pointed that the High Court was also in seisin of the matter and had passed an interim order permitting the construction. The conflicting orders passed by the

*Learned NGT and the High Court would lead to an anomalous situation, where the authorities would be faced with a difficulty as to which order they are required to follow. There can be no manner of doubt that in such a situation, it is the orders passed by the constitutional courts, which would be prevailing over the orders passed by the statutory tribunals*” (emphasis added).

24. CM(M) 1380/2022 is presently pending adjudication and the next date of hearing in the matter is 11.07.2023. It is respectfully submitted that in accordance with the law laid down by the Hon'ble Supreme Court, this Hon'ble Tribunal should await the conclusion of the proceedings before the Hon'ble High Court in CM(M) 1380/2022 before passing any further effective orders on the present Application.

**D. Limitation**

25. Section 14(3) of the NGT Act states that “(n)o application for adjudication of a dispute under this section shall be entertained by the Tribunal unless it is made within a period of **six months from the date**

**on which the cause of action for such dispute first arose**” (emphasis added).

26. Permissions for installation of the subject mobile towers in various parks was granted by Respondent No. 3 to RJIL vide e-tenders dated 26.02.2015, 02.03.2015 and 24.09.2015. The issuance of these tenders is a matter of public record and was widely publicised at the time of their issuance. The towers were installed in 2015 itself, and have since been operating in their present locations in the periphery of the subject parks. It cannot be the case of the Applicants, who claim to be residing in the vicinity of these mobile towers, that they were either unaware of issuance of the e-tender pursuant to which the mobile towers were installed, nor that they were unaware that these towers had been installed and commenced functioning as far back as in 2015. The present Application has therefore been filed with a delay of over 7 years and is barred by limitation under Section 14(3) of the NGT Act.

27. The Applicants have baldly stated that the present Application is within limitation since it pertains to a “*continuing cause of action*”. This

submission is in the teeth of Section 14(3) of the Limitation Act, which provides that the period of limitation of 6 months specified under the section is computed with reference to the “*date on which the cause of action for such dispute **first arose***” (emphasis added). The cause of action in respect of each of the subject mobile towers first arose on the date on which the e-tenders for their installation were issued by Respondent No. 3, or at any rate, arose no later than the respective date(s) on which the mobile towers were installed and commenced functioning at the various locations.

28. The cause of action in the present case is not a continuing one. Even assuming without conceding that the cause of action in the present case is a continuing one, this is of no avail to the Applicant since, once the cause of action “first arose” on various dates in the year 2015, this Application was required to be filed within 6 months of the respective dates on which the cause of action “first arose”. The towers were installed in the year 2015; the cause of action in the present case first arose no later than the various dates in the year 2015 on which the respective towers were installed. The present Application was therefore required to be filed no later than 6 months from the

respective installation dates of the various towers and is therefore hopelessly barred by limitation.

29. The proviso to Section 14(3) of the NGT Act stipulates that this Hon'ble Tribunal can only condone delays of up to 60 days from the date on which the period of limitation specified under the main provision expires. The Hon'ble Tribunal is not empowered by statute to condone any delay beyond this period of 6 months plus 60 days from the date on which the cause of action first arose. The delay in the present case is therefore incapable of being condoned and the present Application must necessarily (it is respectfully submitted) be dismissed as being barred by limitation.

**E. Importance of establishment of Telecom Towers for Telecommunication and Internet Services**

30. India has 1 billion active telecom subscribers as in 2022 and is the fastest growing telecommunications industry in world. Our nation requires the establishment of telecom towers to ensure increased connectivity and better services to be disseminated by the telecom providers. The essential nature of the service provided by the

Answering Respondent and other telecom service providers became clear during the COVID-19 pandemic, where is served as the sole means by which the carry out personal as well as professional activities and access medical, banking, retail and other services.

31. Mobile towers are the backbone of the telecom network and serve to establish and maintain seamless wireless connectivity. The locations of mobile towers are identified with the approval of the Standing Advisory Committee on Radio Frequency Allocation (SACFA) in such a manner as to ensure that customers are able to access the mobile without any break in coverage. If even a single mobile tower in an area is removed this results in creation of a “dark spot” where there is no network coverage and customers are unable to access voice and data services.

32. It is respectfully submitted that in view of the essential nature of the service being provided by Telecom Service Providers such as the Answering Respondent, this Hon'ble Tribunal would be slow to pass any order that may have the effect of impacting citizens' access to telecom services, particularly when

no violation of any applicable law can be demonstrated.

**PARA-WISE REPLY:**

33. Paragraphs 1 is a matter of record and requires no response.
34. Paragraph 2 is denied save and except matters of record. It is specifically denied that any illegality has been committed in connection with the erection of the telecom towers in the various specified locations. In any event, any such alleged illegality is a matter of adjudication by a competent court in a properly constituted proceeding and would fall outside the jurisdiction of this Hon'ble Court under Section 14 of the NGT Act.
35. Paragraph 3 is denied. It is reiterated that there exists no statutory provision which disallows the establishment of telecom towers in parks. To the contrary, applicable law specifically permits installation of mobile towers in parks.
36. Paragraph 4 is denied save and except matters of record. It is expressly denied that that the telecom

towers erected are illegal and/or “*in defiance of the spirit of the public trust doctrine*”. It is denied for want of knowledge that the Applicant is a social worker or that the Applicant has been approached by various people in connection with the subject towers. The orders dated passed by this Hon'ble Tribunal in OA No. 232/2022 are a matter of record, as is the order passed by the Hon'ble Delhi High Court staying the operation of the orders of this Hon'ble Tribunal.

37. Paragraph 5 is denied in toto. It is stated that the installation and operation of the subject mobile towers is strictly in accordance with applicable law. The Answering Respondent was granted the right to establish the subject towers pursuant to an open and transparent e-tendering process, for which due publicity was given by Respondent No. 3. It is denied that there was any connivance between the Answering Respondent and Respondent No. 3 in this regard, or that there is any defiance of law in this connection.

38. Paragraph 6 is a matter of record and requires no response.

39. Paragraph 7 is denied. It is reiterated that there is no illegality in connection with the installation and operation of the subject mobile towers.

**REPLY TO GROUNDS:**

40. Ground A is denied. It is expressly denied that the permission granted to the Answering Respondent to establish the telecom towers was in contravention of any applicable law. It is reiterated that no rules and regulations of the Central Government, the State Government or any Municipal Corporation directions prohibit the establishment of the telecom towers in parks. To the contrary, the applicable regulations expressly permit such installations.
41. Ground B is denied and it is submitted that the establishment of the telecom towers in the public parks has by no means detrimentally affected the recreational spaces since the towers are established on the edge of the parks in a small area of 13.5 sq. m.
42. Grounds C-H are denied. It is denied that the establishment of the telecom towers is in violation of the public trust doctrine, and that any issue falling

with the jurisdiction of this Hon'ble Tribunal has been raised by the Applicant.

43. Grounds I and J are a matter of record to the extent they reproduce various judgments. These judgments are however inapplicable to the present case and do pertain to any issue falling within the jurisdiction of this Hon'ble Tribunal.

44. Paragraphs 8 to 10 do not require a response save for denying that the Applicant is entitled to an award of the costs of the present Application. It is respectfully submitted that that to the contrary, the present Applicant is vexatious and merits dismissal with extreme prejudice and levy of exemplary costs on the Applicant.

45. Paragraph I is denied. It is reiterated that the present Application is hopelessly barred by limitation, delay and laches for the reasons specified hereinabove.

46. Paragraph II is the prayer clause and for the reasons set out hereinabove, it is respectfully prayed that this Hon'ble Tribunal dismiss the present

Original Application and decline the grant of any reliefs prayed for.

For Reliance InfoComm Limited  
  
Authorised Signatory

RESPONDENT NO.7

THROUGH



(R.S. Prabhu & Co.,)  
J-15, Jangpura Extension,  
New Delhi-110014  
Mobile No. 8851382791

PLACE: New Delhi  
DATE: 23.03.2023

BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL  
BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 809 OF 2022

IN THE MATTER OF: -

JAN SEVA WELFARE SOCIETY

...APPLICANT

VERSUS

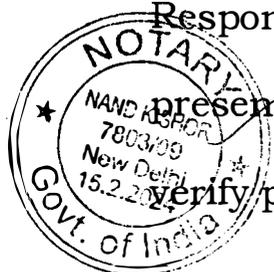
GOVERNMENT OF N.C.T OF DELHI AND ORS.

...RESPONDENTS

**AFFIDAVIT**

I, Sharad Nigam, son of Late V.B. Nigam, aged about 49 years, office at 1st Floor Kanchenjunga Building, 18 Barakhamba Road New Delhi-110001, do hereby solemnly affirm and state as under

1. That I am the authorized representative of the Respondent No.7 and fully conversant with the facts of the present case and as such I am duly authorized to sign, file and verify pleadings for and on behalf of the Petitioner Company.



2. That the accompanying reply has been drafted under my instructions. I have read and understood the contents thereof and affirm the facts as true, correct and consistent with the

best of my knowledge and belief, and that nothing material has been concealed.

For Reliance Jio Infocomm Limited

*[Handwritten Signature]*  
Authorised Signatory

DEPONENT

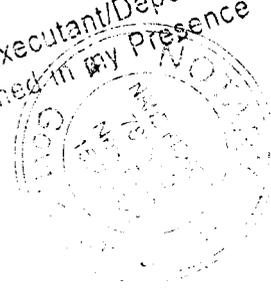
**VERIFICATION:**

Verified and signed at New Delhi on this the \_\_\_\_\_ day March 2023, that the contents of the aforesaid affidavit are true and correct to the best of my knowledge. No part of it is false and nothing material has been concealed therefrom.

SIGNATURE VERIFIED

*[Handwritten Signature]*  
D/957/2013

Identify the Executant/Deponent Who has Signed in my Presence



For Reliance Jio Infocomm Limited

20 MAR 2023  
*[Handwritten Signature]*  
Authorised Signatory

DEPONENT

CERTIFIED THAT THE CONTENTS EXPLAINED TO THE DEPONENT/EXECUTANT WHO IS SEEMED PERFECTLY TO UNDERSTAND AFFIRMED & DEPOSED BEFORE ME AT NEW DELHI

*[Handwritten Signature]*  
IDENTIFY THE EXECUTANT/DEPONENT WHO HAS SIGNED & DEPOSED BEFORE ME  
NOTARY PUBLIC (NEW DELHI)  
NAI

20 MAR 2023

BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL  
BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 809 OF 2022

IN THE MATTER OF:-

JAN SEVA WELFARE SOCIETY	APPELLANT
VERSUS	
GOVERNMENT OF N.C.T OF DELHI AND ORS.	RESPONDENTS

**VAKALATNAMA**

KNOW ALL to whom these presents shall come that we, I Sharad Nigam, do hereby appoint, MR. K.R.SASIPRABHU, ADVOCATE R.S.PRABHU & CO., J-15, JANGPURA EXTN., NEW DELHI – 110014; Ph 011-24323732-34 (hereinafter called the Advocate) to be my/our Advocate in the above noted case and authorize them)

To act, appear plead in the above noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court on payment of fees separately for each court by me/us. To sign, file verify and present pleadings, replications, appeals, cross objections or petitions for executions, review, revision, restorations, withdrawal, compromise or other petition, replies, objections or affidavits or other documents as maybe deemed necessary or proper for the prosecution of the said case in all its stages. To file and take back documents

To withdraw, or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take out execution proceedings.

To deposit, draw and receive moneys, cheque and grant receipt thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the case.

To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes.

And I/We undertake that I/We or my/our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.

And I/We the undersigned do hereby agree to ratify and confirm acts done by the Advocate or his substitute in the matter as my/our duly

authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called up for hearing, or any negligence of the said Advocate/s or his/their substitute. And I/We the undersigned do hereby agree that in the event of the whole or any part of the fee agreed by me/us to be paid to the Advocate remaining unpaid he/they shall be entitled to withdraw from the prosecution of the said case until the same is paid up. If -any costs are allowed for an adjournment, the Advocate would be entitled to the same. The fee settled is only for the above case and court.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to those presents the contents of which have been understood by me/us this the day of 29 March, 2023.

ACCEPTED

For Reliance Jio Infocomm Limited

*[Signature]*  
CLIENTS

*[Signature]*  
K.R. SASIPRABHU  
D/462/1984  
9971233838

*[Signature]*  
VINAYAK MAINI  
D/2240/2019

Signature  
verified  
*[Signature]*  
D/1957/2023

*[Signature]*  
VISHNU SHARMA  
D/957/2013

*[Signature]*  
PRAKHAR AGARWAL  
D/7854/2021

*[Signature]*  
TUSHAR BHARDWAJ  
D/2346/2016

*[Signature]*  
MANAN SHISHODIA  
D/5037/2017



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**Advance Service || O.A No. 809/2022- Jan Seva Welfare Society v Government of NCT of Delhi**

1 message

**R S Prabhu Office** <office@rsprabhu.com>

Mon, Mar 20, 2023 at 2:52 PM

To: "mrclegal65@gmail.com" &lt;mrclegal65@gmail.com&gt;, dheeraj.adv011@gmail.com, csdelhi@nic.in, chdpcc@nic.in, lgdelhi@dda.org.in, dcnw@nic.in, moc-office@gov.in, rajinder.kumar@industowers.com

Cc: K R Sasiprabhu &lt;sasiprabhu@rsprabhu.com&gt;, Vishnu Sharma &lt;vishnu@rsprabhu.com&gt;, Prakhar Agarwal &lt;prakhar.agarwal@rsprabhu.com&gt;

Sir,

Attached herewith is the Reply on behalf of Respondent No. 7 to the Application under Section 18 r/w Section 14,15,17 of the National Green Tribunal Act in the captioned matter.

This may be treated as the advance service upon you of the aforesaid Reply.

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Yours sincerely,

**RS Prabhu & Company**

T: +91-11-2432 3732, 2432 3733 | E: office@rsprabhu.com



RS PRABHU

RS Prabhu &amp; Company

J-15 Jungpura Extension | New Delhi 110014 | India

Telephone: +91-11-2432 3732, 2432 3733 | Email: office@rsprabhu.com

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 **Reply on behalf of Respondent No. 7.pdf**

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