

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

ORIGINAL APPLICATION No 689 of 2023

IN THE MATTER OF:

SANJAY KUMAR

... APPLICANT / PETITIONER

Versus

UNION OF INDIA AND OTHERS

... RESPONDENTS

INDEX

S.No.	PARTICULARS	Pg. No.
1.	Response on behalf of Respondent No.3 - National Highways And Infrastructure Development Corporation Limited (NHIDCL) to the Reply to O.A. filed by the Respondent No.6 BRO along with affidavit.	1-7
2.	ANNEXURE R - 3/7 Copy of the MoM dated 20.11.2024	8-11
3.	ANNEXURE R - 3/8 Copy of the record of discussion dated 28.11.2024	12-13
4.	ANNEXURE R - 3/9 Copy of the letter dated 29.11.2024	14-19
5.	Proof of Service by email	

Respondent No.3

New Delhi,
Date: 02.12.2024

Through


Avneesh Garg

(Advocate for Respondent No.3)

Chamber No. 211, LCB-III,

Delhi High Court, New Delhi - 110503

avneesh.legal@gmail.com; 9818479699

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RESPONSE ON BEHALF OF RESPONDENT No.3 – NATIONAL
HIGHWAYS AND INFRASTRUCTURE DEVELOPMENT
CORPORATION LIMITED (NHIDCL) TO THE REPLY TO O.A.
FILED BY THE RESPONDENT No.6 BRO

MOST RESPECTFULLY SHOWETH:

Answering Respondent is submitting its response to the Reply filed by BRO to the present OA for placing on record, the true and correct facts of the case so that there is no ambiguity with respect to the scope of responsibility of the two agencies of the Ministry of Road Transport and Highways being NHIDCL on one hand and BRO on the other. In this regard, the answering Respondent No.3 NHIDCL seeks to place on record the following facts:

1. In essence, it is the case of BRO, as stated in its reply that the stretches entrusted to NHIDCL have not been take over by it for certain reasons. In this regard, the answering Respondent – NHIDCL re-iterates the contents of its short reply filed in response to the present OA which

shall demonstrate the sequence of events in the present case and the limited scope of the responsibility of the answering Respondent.

2. Be that as it may, this Hon'ble Tribunal, after hearing the submissions of NHIDCL and other parties on 23.08.2024, directed the Secy, MoRTH to convene a meeting with the respective heads of BRO and NHIDCL to clear the issue of responsibility of the given stretches in the said project. In pursuance of such direction, the meeting took place between the said three functionaries on 20.11.2024 and after due deliberations, all issues with respect to the handing over of the given stretches were resolved while clarifying the scope of the responsibility of each of the two agencies viz – NHIDCL and BRO. During the meeting, BRO was directed to take over the standalone projects of NHIDCL on NH-34 at the earliest. Further, consequent to the meeting taken by the Secretary, RT&H, NHIDCL HQ vide letter dated 28.11.2024 had conveyed the directions to the Regional office of NHIDCL to handover the roads at the earliest. Moreover, in the meeting held with BRO on 28.11.2024, the joint Survey for handing over the stretch to BRO was also discussed. Further BRO has also issued instructions to its office to Take over the roads from NHIDCL vide letter dated 29.11.2024. Copy of the MoM dated 20.11.2024 is annexed herewith as **ANNEXURE R – 3/7**, Copy of the Record Of Discussion dated 28.11.2024 is annexed herewith as **ANNEXURE R**

– 3/8 and Copy of the letter dated 29.11.2024 is annexed herewith as **ANNEXURE R – 3/9.**

3. In view of the specific contents of the aforesaid MoM, the contentions raised by the BRO with respect to any issue qua handing over /taking over of the given stretches, stands closed.

PARA-WISE REPLY:

- 1-3 The contents of Paras 1 to 3 of the Reply are a matter of record.
4. The contents of Para 4 of the Reply are only partly correct inasmuch as though the work of preparation of DPR was assigned to the answering Respondent No.3 NHIDCL, however, as stated aforesaid, the answering Respondent was concerned with the standalone project of Slope Stabilization for stretch of 760 meters at Barethi, Uttar Kashi from KM 100.300 to KM 101.060. As stated, later, in the second phase, an additional work for construction of Landslide Protection Gallery, Slope Protection work etc. were also done by the answering Respondent. It is correct to state that after completion of the said works, the same were entrusted to BRO, however, BRO, for certain reasons not attributable to NHIDCL, did not take over the said stretches from NHIDCL. It is incorrect to state that the handover is not taken by BRO as the work is not proper. It is also incorrect that the Slope Protection

works were to remain with NHIDCL till completion of Maintenance Period of the Contract. It is submitted that the entire project was to be taken over by BRO along with the liabilities and obligations of the respective contractors. Notwithstanding the above, During the meeting held on 20.11.2024 in compliance with the direction of the Hon'ble NGT under the chairmanship of Secretary, MoRTH and the heads of NHIDCL and BRO, BRO was directed to take over the standalone projects of NHIDCL on NH-34 at the earliest. Further, consequent to the meeting taken by the Secretary, RT&H, NHIDCL HQ vide letter dated 28.11.2024 had conveyed the directions to the Regional office of NHIDCL to handover the roads at the earliest. Moreover, in the meeting held with BRO on 28.11.2024, the joint Survey for handing over the stretch to BRO was also discussed. Further BRO has also issued instructions to its office to Take over the roads from NHIDCL vide letter dated 29.11.2024. Copy of the MoM dated 20.11.2024 is annexed herewith as **ANNEXURE R – 3/7**, Copy of the Record Of Discussion dated 28.11.2024 is annexed herewith as **ANNEXURE R – 3/8 and** Copy of the letter dated 29.11.2024 is annexed herewith as **ANNEXURE R – 3/9**.

- 5-7. With respect to the contents of Paras 5 to 7 of the Reply, it is submitted that the said communications do not pertain to the issue of handing over

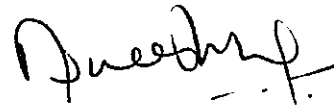
of the site. Insofar as the question of any change in the scope of work is concerned, the same has become irrelevant inasmuch as all the contracts granted by the answering Respondent stand completed with issuance of respective completion certificates.

8. The contents of Para 8 of the Reply are wrong and hence denied. Any alleged unilateral inspection conducted by BRO in the year 2022 has no bearing or relevance to the facts in issue inasmuch as more than two monsoon seasons have already passed without any substantial untoward occurrence. The observations mentioned in the para under reply are also denied for the same reason.
9. The contents of Para 9 of the Reply are a matter of record except to the fact that the completion certificates for all the works pertaining to the answering Respondent have already been issued.
10. Contents of Para 10 of the Reply do not concern the answering Respondent. In any case, under the aforesaid MoM dated 20.11.2024, the issue with respect to the taking over of the given stretches stands resolved.

11-14. The contents of Para 11 of the Reply are a matter of record. Contents of Paras 12 to 14 of the Reply need no reply.


RESPONDENT NO.3

Through:



**AVNEESH GARG
COUNSEL FOR THE RESPONDENT NO.3**

New Delhi
Dated:02.12.2024

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

ORIGINAL APPLICATION No 689 of 2023

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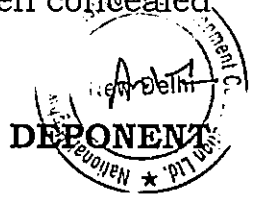
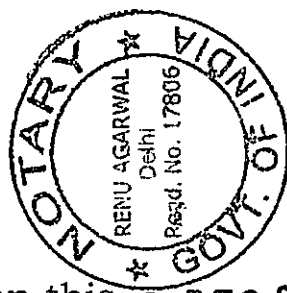
... RESPONDENTS

AFFIDAVIT

I, Ankush Mehta S/o Sh. Suresh Kumar Mehta, aged about 35 years working at Respondent No.3 as General Manager (Technical) do hereby solemnly affirm and state on oath as under: -

1. That I am working as General Manager (Technical) of the Respondent No. 3 abovenamed and am well conversant with the facts and circumstances of the case based on the record available with the office and, am fully competent and authorized to swear and file this Affidavit.
2. That the enclosed Response has been drafted at the instructions of the Respondent No. 3 and the statements made therein are based on record and are believed by me to be true and correct and no part of it is false and nothing material has been concealed therefrom.

Suresh Kumar Mehta
 D13650/03
 I identified the deponent who has signed in my presence



VERIFICATION

Verified at New Delhi on this ~~07 DEC 2024~~ 02 DEC 2024, I, the Deponent herein, do hereby state on oath and solemn affirmation that contents of this Affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.



02 DEC 2024

	123+970)						
	(ii) Dharashu-Gangotri Road (Km 123.080 to Km 123.970)	34	Landslide Mitigation	0.890	Valley Side	08.01.2019	DLP to be completed on 09.08.2025
2	(i) Bareti Landslide (Km 100.300 to Km 101.060) including protection gallery	34	Landslide Mitigation	0.760	Hillside	04.01.2018	DLP to be completed on 30.04.2025
	(ii) Additional Work at Bareti (Km 100.300 to Km 101.060)	34	Landslide Protection gallery	0.760	Hillside & protection on Roadside	31.08.2020	DLP to be completed on 28.05.2027

(ii) DPR for the Dharasu-Gangotri stretch from Km 0.00 to Km 124.00 on NH-34 was prepared by NHIDCL and was handed over to BRO as per the direction of MoRT&H. However, the above-mentioned slope protection works were executed by NHIDCL as standalone projects as per directions of MoRT&H.

(iii) Prior to completion of the above-mentioned works, NHIDCL initially in March 2022 requested BRO to take over these stretches for better administration and maintenance of NH-34.

(iv) In response, BRO requested that the stretch may continue to remain with NHIDCL till completion of maintenance period and thereafter, these works may be handed over to BRO.

(v) Landslides/erosions have been observed on the valley side of the Barethi location. On enquiry by Secretary (RT&H), it was clarified by NHIDCL that landslide is on valley side and the standalone projects executed by NHIDCL for landslide protection and protection gallery are on the hillside; therefore these are beyond the scope of the present contractor.

(vi) It was further apprised that landslide mitigation measures are required to be studied by specialised agency like THDC or any other agency of repute and DPR may be got prepared.

6. DG(BR) expressed concerns regarding the stability/ structural integrity of protection gallery as the landslide on the valley side has exposed foundation of some piers.

7. After detailed deliberations, following decisions were taken: -

(i) Sections of aforesaid isolated stretches of NH-34 shall be immediately handed over by NHIDCL to BRO; BRO to take over these stretches forthwith;

(ii) Tripartite Agreement shall be signed between NHIDCL, BRO and concerned Contractor engaged by NHIDCL to ensure rectification of defects under DLP and concurrent maintenance obligations of Contractors;

- (iii) NHIDCL shall urgently identify defects to be rectified under DLP, give notice for implementing the same to the Contractors with copies endorsed to BRO and MoRT&H; NHIDCL to also ensure providing needful supports in rectification of the defects wherever required even after the sections are handed over to BRO;
- (iv) BRO shall take up urgent necessary action for preparing DPRs for the protection works on the stretches required, finalize rectification plans and proposals for sanction by MoRT&H;
- (v) MoRT&H shall provide funds for the additional protection works.

8. The meeting ended with a Vote of Thanks to the Chair.

Annexure

List of participants in the Meeting held under the Chairmanship of Secretary (RT&H) with Director General (Border Roads) and Managing Director (NHIDCL) on 20.11.2024 in compliance to NGT order dated 23.08.2024 in OA. No. 689/2023 (Sanjay Kumar v. Union of India & Ors.) before the Hon'ble National Green Tribunal, Principal Bench, New Delhi

1. Ministry of Road Transport & Highways

- i. Sh. V Umashankar, Secretary, MoRTH, New Delhi - **In Chair**
- ii. Sh. D. Sarangi, DG(RD)&SS, MoRTH, New Delhi
- iii. Sh. Sudip Chaudhury, ADG (NoRTH-I), MoRTH, New Delhi
- iv. Sh. Rananjay Singh, SE (NoRTH-I), MoRTH, New Delhi

2. Border Road Organization (BRO)

- i. Lt Gen Raghu Srinivasan, VSM, DGBR, New Delhi
- ii. Brig. Prasanna S Joshi, CE(P) Shivalik, Border Road Organization, Dehradun, Uttarakhand

3. National Highways & Infrastructure Development Corporation Limited (NHIDCL)

- i. Sh. Krishan Kumar, Managing Director, NHIDCL New Delhi.
- ii. Sh. Amrendra Kumar, Director(Tech), NHIDCL, New Delhi.



NHIDCL/RO-DDN/Additional Barethi/A-41/Corr/24-25/4891

Date: 02.12.2024

To

The Executive Director(T)-III
HQ-NHIDCL, New Delhi

Sub:- Original application no.689/2023 Sanjay Kumar Vs Union of India and Others at National Green Tribunal, Principal Bench, New Delhi.-Reg.

Ref:

- i) Ministry MoM dated 20.11.2024.
- ii) BRO letter no.2005/Chardham/Handing Taking/29/EPC Cell dated 29.11.2024.

Sir,

In compliance of the Ministry's direction in the meeting dated 20.11.2024, GM(P), RO-Dehradun alongwith DGM(P), PMU-Barkot had a meeting with Commander, SE(Civ), 36 BRTF, Uttarkashi on 28.11.2024 regarding transfer of Nalupani and Barethi stretch of NH-34 to BRO. The record of the discussions is enclosed herewith for kind information and necessary action for filing affidavit in Hon'ble NGT accordingly in the subject matter. Further, BRO vide its letter under reference (ii) has also confirmed the date of site visit, the same is attached herewith.

2. This is issued with the approval of ED(P), RO-Dehradun.

Encl: As above



Raj Kishor Singh
General Manager (P)
RO, NHIDCL-Dehradun

Copy to:-

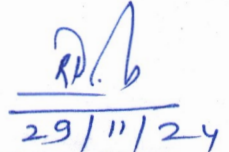
- i. The Chief Engineer, RO-MoRTH, Dehradun - for kind information please.
- ii. The Commander, 36 BRTF in reference to your letter dated 29.11.2024.
- iii. The DGM(P), PMU-Barkot to remain in active liasoning with BRO and submit report of joint visit.
- iv. Office Copy.

Record of Discussions of GM(P), RO-Dehradun, NHIDCL with BRO on 28th Nov'2024

The undersigned and DGM(P), PMU-Barkot, NHIDCL had a meeting with Commander, SE(Civ), 36 BRTF, Uttarkashi on 28.11.2024 regarding transfer of Nalupani and Barethi stretch of NH-34 to BRO in compliance of the Ministry's direction in the meeting dated 20.11.2024. It was decided by BRO that a joint inspection will be carried out on 09.12.2024 for recording of inventory in presence of concerned NHIDCL PMU, BRO, AE and EPC Contractor of the respective projects. NHIDCL requested for carrying out joint inspection on an early date upon which it was intimated by BRO that Executive Engineer and SE will not be available up to 06.12.2024 due ^{to} some other urgent work.

2. BRO informed that the defects of the respective projects under DLP will be noted in presence of all concerned stakeholders and Contractor will submit an undertaking that the defects noticed/ identified will be rectified by the EPC Contractor after take over by BRO. NHIDCL shall handover the undertaking to BRO prior to the handing over of the Nalupani and Barethi stretch.

3. Further, BRO has also informed that all relevant supporting documents such as as-build drawings, litigation issues and payment status be handed over to BRO at the time of signing of tripartite agreement. Meeting concluded with positive notes.



Raj Kishor Singh
General Manager (P)
RO, NHIDCL-Dehradun

Headquarters

36 Border Roads Task Force

PIN: 930 036

C/O 56 APO

2005/Chardham/Handing Taking/ 29 /EPC Cell

29 Nov 2024

1442 BCC (GREF)

C/O 56APO

Pin- 931442

HANDING/TAKING OF NHIDCL STANDALONE PROJECT

- Please refer MoM , under the Chairmanship of Secretary (RT&H) with DGBR and MD NHIDCL dated 20 Nov 2024 (Copy enclosed).
- As per the MoM dated 20 Nov 2024, BRO has to take over the following standalone slope protection works including Barethi project on NH-34 by NHIDCL:-

S.No	Project Description	NH No	Scope of work			Appointed date	DLP Status
01	(i) Nalupani Landslide zone(Km 123.080 to Km 123.480, Km 123.665 to Km 123.740, Km 123.770 to km123.970)	34	Landslide mitigation	0.675	Hillside	11 Sep 2017	DLP completed on 15 Jan 2024
	(ii) Dharashu Gangotri Road (Km 123.080 to Km 123.970)	34	Landslide mitigation	0.890	Valley side	08 Jan 2019	DLP to be completed on 09 Aug 2025
02	(i) Barethi Landslide (Km 100.300 to Km 101.060) including protection gallery	34	Landslide mitigation	0.760	Hill side	04 Jan 2028	DLP to be completed on 30 Apr 2025
	(ii) Additional work at Bareti (Km 100.300 to Km 101.060)	34	Landslide Protection gallery	0.760	Hill side & protection on road	31 Aug 2020	DLP to be completed on 28 May 2027

- In view of the above, date of 09 Dec 2024 has been fixed for joint survey with NHIDCL as per their request, OC 1442 BCC is requested to co-ordinate with NHIDCL and complete the Handing Taking as per procedure.
- For info and necessary action please.

(A.N.Singh)
EE (Civ)
SO (EPC Cell)
For Commander

Encls : 04 Sheets

W

Copy to-

O/o Managing Director,
NHIDCL,
3rd Floor, PTI Building 4
Parliament Street
New Delhi-110001

:- For info please

HQ CE (P) Shivalik/EPC Cell
C/o 56 APO
Pin 931718

:- For info please.

File No.: NH-12024/03/2024/UK/North-I
Government of India
Ministry of Road Transport & Highways
(Zone -I)
Transport Bhawan, 1, Parliament Street, New Delhi - 110001

Dated: /11/2024

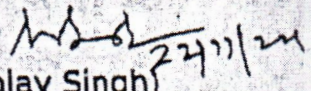
OFFICE MEMORANDUM

Subject: Minutes of Meeting held under the Chairmanship of Secretary (RT&H) with Director General (Border Roads) and Managing Director (NHIDCL) on 20.11.2024 in compliance to NGT order dated 23.08.2024 In OA. No. 689/2023 (Sanjay Kumar v. Union of India & Ors.) before the Hon'ble National Green Tribunal, Principal Bench, New Delhi – reg.

Please find enclosed the Minutes of Meeting held under the Chairmanship of Secretary (RT&H) with Director General (Border Roads) and Managing Director (NHIDCL) on 20th November, 2024 at New Delhi on the subject matter.

It is requested to take necessary action accordingly and submit the Action Taken Report (ATR).

Encl: As above.


(Rananjay Singh)
Superintending Engineer (North I)
For DG (RD) & SS

To

1. Director General (Border Roads), BRO, New Delhi
2. Managing Director, NHIDCL, New Delhi

Copy to:

1. PSO to Secretary (RT&H)
2. PSO to DG (RD) & SS, MORTH
3. PS to ADG (North I), MORTH
4. RO, MORTH, Dehradun

Minutes of Meeting held under the Chairmanship of Secretary (RT&H) with Director General (Border Roads) and Managing Director (NHIDCL) on 20.11.2024 in compliance to NGT order dated 23.08.2024 in OA. No. 689/2023 (Sanjay Kumar v. Union of India & Ors.) before the Hon'ble National Green Tribunal, Principal Bench, New Delhi - Reg.

At the outset Secretary (RT&H) welcomed the participants to the meeting which was held in compliance to NGT order dated 23.08.2024 in OA. No. 689/2023 (Sanjay Kumar v. Union of India & Ors.) before the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

List of participants is annexed.

2. Hon'ble NGT, Principal Bench, New Delhi vide its order dated 23.08.2024 in the context of Original Application No. 689/2023 (Sanjay Kumar vs Union of India) directed that the Secretary, MoRTH to hold the meeting of heads of both organizations, i.e., NHIDCL and BRO and ascertain and fix the responsibility on the one organization for construction of landslide protection gallery, slope protection work and river protection work at Barethi, Uttarkashi in Gangotri National Highway taking cognizance of contradictory stands taken by BRO & NHIDCL. The next date of hearing is on 03.12.2024.

3. The MoRT&H and NHIDCL were impleaded as Respondent no. 2 and respondent No. 3 respectively in the above mentioned Original Application; MoEF&CC is Respondent no. 1; BRO was subsequently impleaded as Respondent no. 5 in hearing dated 29.02.2024. The application pertains to Badethi/Barethi location on NH-34 in the state of Uttarakhand and was first heard on 09.11.2023.

4. Vide order dated 09.11.2023, Hon'ble NGT, Principal Bench, New Delhi also Inter-alia noted that "Land subsidence and landslide activities triggered by the river's force have caused considerable damage to the highway at three major locations namely Chinyalisaur, Matli and Badethi Chungli".

5. MD (NHIDCL) apprised following:-

(i) NHIDCL had executed following standalone slope protection works including the Barethi project on NH-34:-

S. No	Project Description	NH No.	Scope of Work			Appointed Date	DLP Status	St Ent
			Type of work	Length	Location			
1	(i) Nalupani Landslide Zone (Km 123+080 to Km 123+480, Km 123+665 to Km 123+740, and Km 123+770 to Km	34	Landslide mitigation	0.675	Hillside	11.09.2017	DLP completed on 15.01.2024	

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- 1 -

	123+970)						
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(ii) DPR for the Dharasu-Gangotri stretch from Km 0.00 to Km 124.00 on NH-34 was prepared by NHIDCL and was handed over to BRO as per the direction of MoRT&H. However, the above-mentioned slope protection works were executed by NHIDCL as standalone projects as per directions of MoRT&H.

(iii) Prior to completion of the above-mentioned works, NHIDCL initially in March 2022 requested BRO to take over these stretches for better administration and maintenance of NH-34.

(iv) In response, BRO requested that the stretch may continue to remain with NHIDCL till completion of maintenance period and thereafter, these works may be handed over to BRO.

(v) Landslides/erosions have been observed on the valley side of the Barethi location. On enquiry by Secretary (RT&H), it was clarified by NHIDCL that landslide is on valley side and the standalone projects executed by NHIDCL for landslide protection and protection gallery are on the hillside; therefore these are beyond the scope of the present contractor.

(vi) It was further apprised that landslide mitigation measures are required to be studied by specialised agency like THDC or any other agency of repute and DPR may be got prepared.

6. DG(BR) expressed concerns regarding the stability/ structural integrity of protection gallery as the landslide on the valley side has exposed foundation of some piers.

7. After detailed deliberations, following decisions were taken: -

(i) Sections of aforesaid isolated stretches of NH-34 shall be immediately handed over by NHIDCL to BRO; BRO to take over these stretches forthwith;

(ii) Tripartite Agreement shall be signed between NHIDCL, BRO and concerned Contractor engaged by NHIDCL to ensure rectification of defects under DLP and concurrent maintenance obligations of Contractors;

HS

(iii) NHIDCL shall urgently identify defects to be rectified under DLP, give notice for implementing the same to the Contractors with copies endorsed to BRO and MoRT&H; NHIDCL to also ensure providing needful supports in rectification of the defects wherever required even after the sections are handed over to BRO;

(iv) BRO shall take up urgent necessary action for preparing DPRs for the protection works on the stretches required, finalize rectification plans and proposals for sanction by MoRT&H;

(v) MoRT&H shall provide funds for the additional protection works.

8. The meeting ended with a Vote of Thanks to the Chair.

Annexure

List of participants in the Meeting held under the Chairmanship of Secretary (RT&H) with Director General (Border Roads) and Managing Director (NHIDCL) on 20.11.2024 in compliance to NGT order dated 23.08.2024 in OA. No. 689/2023 (Sanjay Kumar v. Union of India & Ors.) before the Hon'ble National Green Tribunal, Principal Bench, New Delhi

1. Ministry of Road Transport & Highways

- i. Sh. V Umashankar, Secretary, MoRTH, New Delhi - In Chair
- ii. Sh. D. Sarangi, DG(RD)&SS, MoRTH, New Delhi
- iii. Sh. Sudip Chaudhury, ADG (NoRTH-I), MoRTH, New Delhi
- iv. Sh. Rananjay Singh, SE (NoRTH-I), MoRTH, New Delhi

2. Border Road Organization (BRO)

- i. Lt Gen Raghu Srinivasan, VSM, DGBR, New Delhi
- ii. Brig. Prasanna S Joshi, CE(P) Shivalik, Border Road Organization, Dehradun, Uttarakhand

3. National Highways & Infrastructure Development Corporation Limited (NHIDCL)

- i. Sh. Krishan Kumar, Managing Director, NHIDCL New Delhi.
- ii. Sh. Amrendra Kumar, Director(Tech), NHIDCL, New Delhi.

[Handwritten signature]

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Avneesh Garg <avneesh.legal@gmail.com>

OA No. 689 of 2023 titled as "SANJAY KUMAR VS. UOI & ORS"

1 message

Avneesh Garg <avneesh.legal@gmail.com>
To: emailtogkb@gmail.com, gigicgeorge.adv42@yahoo.in

Mon, Dec 2, 2024 at 6:50 PM

PFA, the response on behalf of R3 to the reply to O.A. filed by the Respondent No.6/BRO in the captioned matter.

Regards,
Avneesh Garg
Advocate

