

**BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,  
NEW DELHI  
Original Application No. 366/2025**

**IN THE MATTER OF:-**

Ray Singh

...Applicant

Versus

M/s Utara Brick & Ors.

..Respondents

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New Delhi

Dated 26/11/2025

Through



Rakesh Kakar  
Advocate

C-1/D, Ground Floor,  
Green Park Extn.,  
New Delhi-110016  
9810383620

[kakaradvocate@yahoo.com](mailto:kakaradvocate@yahoo.com)

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**REJOINDER ON BEHALF OF APPLICANT TO THE REPLY FILED BY  
THE RESPONDENT NO. 3 (UPPCB).**

**MOST RESPECTFULLY SHOWEATH: -**

- 1-4. That the contents of paras no. 1 to 4 of the reply are matter of record and needs no rejoinder.
5. That the contents of para no. 5 of the reply filed on behalf of respondent no. 3 are sufficient to show that the inspite of issuance of direction dated 11.02.2023 by the respondent no.3 to respondent no. 1 to close the brick klin with immediate effect the respondent no. 1 miserably failed to made any compliance of the same. It is further submitted that the competent officers also failed to execute the said directions dated 11.02.2023 passed by the respondent no. 3 against the respondent no. 1 and respondent no. 1 brick klin is running in violation of law.
6. That the contents of para no. 6 of the reply filed on behalf of respondent no. 3 further corroborate the submissions made in the application by the applicant. It is submitted that the respondent no. 3 categorically admitted that the respondent no. 1 running the brick klin without having consent to establish (CTE) and consent to operate ( CTO) from UPPCB and this is completely the violation of the Uttar Pradesh brick klins (sitting criteria of establishment) rules, 2012 and the UPPCB also issued the notice to the brick klin in question on 16.07.2025 but despite that the brick klin still in operation and the respondent no. 1 failed to give any explanation in the application despite receiving notice from this Hon'ble Tribunal and chooses not to appear before this Hon'ble Tribunal and filed any reply. This is sufficient for this Hon'ble Tribunal to pass the appropriate Directions / Orders and the respondent no.1 and brick klin.

7. That the contents of para no. 7 of the reply filed on behalf of respondent no. 3 shows that respondent no. 3 is completely agreed with the allegations made in the application and pending for adjudication. However, the respondent no. 3 failed to disclose what steps has been taken in follow ups after passing the necessary closure orders dated 11.02.2023 vide letter no. H88999/C-4/Sa-II-758 / Bandi / 2023 and simply did the formality. It is necessary to bring on record that the respondent no. 3 was in the complete knowledge about the running of illegal brick klin and illegal mining from agriculture land but the officials has not taken any action against the respondent no 1 / errant persons.
8. That the contents of para no. 8 of the reply filed on behalf of respondent no. 3 stated about the inspection of brick klin in question on 29.07.2025 but no constructive action has been taken against the respondent no. 1 and brick klin. It is worth mention that the inspection was also performed only after passing of the directions/orders dated 24.07.2025 by this Hon'ble Tribunal, whereas the complaints given to the respondent no. 3 earlier also and in fact the closure order was passed somewhere on 11.02.2023 by the respondent no. 3 against the brick klin but due to lack of follow ups the orders passed by the respondent no. 3 never been complained by the concerned officers.
9. That the contents of para no. 9 of the reply filed on behalf of respondent no. 3 further corroborate the submissions of running brick klin and doing illegal mining from agriculture land and operation of brick klin without having valid consent to operate from the UPPCB.
10. That the contents of para no. 10 of the reply filed on behalf of respondent no. 3 further corroborate the submissions made in the application by the applicant and nothing is left but to pass the appropriate and immediate directions against the respondent no. 1 and considering the lack of execution of orders by the concerned authorities it is necessary to demolish the chimney of the brick klin and also passed the orders for compensation.

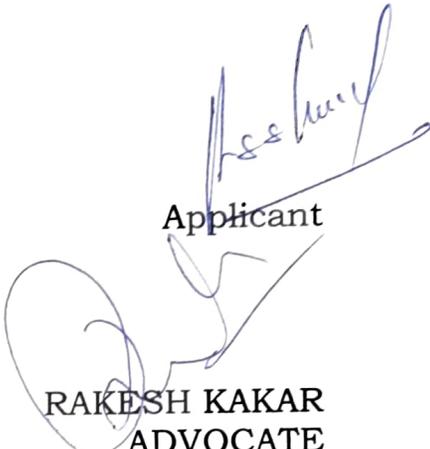
**PRAYER**

It is therefore prayed to this Hon'ble Court under the above facts and circumstances kindly allow the original application of the applicant in the interest of justice.

Any other relief which this Hon'ble Tribunal may deem fit and proper may also be passed in favor of applicant.

New Delhi

Dated:- 26/11/2025 Through

  
Applicant

RAKESH KAKAR  
ADVOCATE  
KAKAR&KAKAR  
ADVOCATES  
C-1/D, GROUND FLOOR  
GREEN PARK EXTENSION  
NEW DELHI-110016  
9810383620  
[kakaradvocate@yahoo.com](mailto:kakaradvocate@yahoo.com)

**BEFORE THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,  
NEW DELHI**

**Original Application No. 366 /2025**

**IN THE MATTER OF:-**

Ray Singh

...Complainant

Versus

M/s Utara Brick & Ors.

..Respondents

**AFFIDAVIT**

I, Ray Singh S/o Sh. Parshuram aged about 40 years House No. 7/K Village Longpur, P.S. Sidhpura Kasganj, Uttar Pradesh- 207246 presently at Delhi do hereby solemnly affirm and declare as under: -

1. That the deponent is complainant in the abovesaid case and the same is pending for adjudication before this Hon'ble Court.
2. That the accompanying rejoinder to the reply filed by the respondent no. 3 (UPPCB) by the re has been drafted by my counsel under my instructions and I say that the contents of the same are true and correct and has been explained to me in a vernacular language and the same are understood by me which are true and correct.
3. That the contents of the accompanying rejoinder be read as part and parcel of this affidavit as the same have not been repeated herein for the sake of brevity.

*Handwritten:* Identify the Deponent Who Has Signed/Put In My Presence

*Handwritten Signature*  
DEPONENT

**VERIFICATION:-**  
The Seal of the Oath Commissioner  
SI. No. 29/2024  
HEM LATA SHARMA  
By Delhi High Court  
Per From 18/11/2024  
to 10/2024  
New Delhi-17

12 6 NOV 2025

Verified at Delhi on this day of November, 2025 that the contents of the above affidavit are true and correct to the best my knowledge and nothing has been concealed therefrom.

**CERTIFIED THAT THE DEPONENT**  
Shri / Smt. / Km. ....  
R/o .....  
identified by Shri / Smt. ....  
Has solemnly affirmed before me at  
Delhi..... SI. No. ....  
That the contents of the affidavit which  
have been & explained to him are  
true and correct to the knowledge

*Handwritten Signature*  
DEPONENT

12 6 NOV 2025 Oath Commissioner, Delhi  
HEM LATA SHARMA

(5)

**M** Gmail

Rakesh Kakar &lt;kakarrakesh11@gmail.com&gt;

**Service of Rejoinder on behalf of the applicant to the reply filed by the R-3 (UPPCB) 366/2025 Ray Singh bs M/s Utara Brick Field**

1 message

Rakesh Kakar <kakarrakesh11@gmail.com>  
To: pradeepmisra@yahoo.com

Wed, Nov 26, 2025 at 1:45 PM

Dear Sir,

Please find enclosed herewith the copy of rejoinder on behalf of the applicant to the reply filed by the R-3 (UPPCB) in the matter O.A. 366/2025 case titled Ray Singh vs M/s Utara Brick Field pending before the Hon'ble Principal Bench of NGT, New Delhi.

Regards

**Rakesh Kakar****Advocate***Kakar & Kakar***ADVOCATES****Office at: C-1/D Ground Floor,****Green Park Extn., New Delhi-110016****9810383620****Email: kakarrakesh11@gmail.com** **Rejoinder NGT.pdf**  
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