

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH NEW DELHI

ORIGINAL APPLICATION NO. 1150 OF 2024

IN THE MATTER OF:

D5 & D8 RESIDENTS' WELFARE ASSOCIATION,
MODEL TOWN, NEW DELHI

...APPLICANT

VS.

HORTICULTURE DEPARTMENT OF MUNICIPAL CORPORATION DELHI,
KESHAVPURAM ZONE & ANR.

...RESPONDENTS

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**REJOINDER ON BEHALF OF APPLICANT TO SHORT REPLY DATED 7
MARCH 2025 AND SUPPLEMENTARY REPLY DATED 9 APRIL 2025 FILED
ON BEHALF OF RESPONDENT NO. 1 TO ORIGINAL APPLICATION**

MOST RESPECTFULLY SHOWETH

1. At the outset, it is submitted that the Short Reply dated 7 March 2025 and the Supplementary Reply dated 9 April 2025 (collectively referred to as "**Replies**") filed on behalf of the Respondent No. 1 to the present Original Application filed on behalf of the Applicant are based on patently false and misleading facts and deserves no indulgence from this Hon'ble Tribunal. Respondent No. 1 has misrepresented the facts and concealed material facts to suit the Respondents' *mala fide* actions. It is further submitted that the contents of the Original Application may be read and treated as part and parcel of the present Rejoinder, and each and every allegation in the Replies, which is inconsistent or contrary thereto, is denied, as though specifically traversed and set forth herein below.

2. PRELIMINARY SUBMISSIONS

I. RESPONDENT NO. 1 IS VIOLATING ITS OWN POLICY OF
ORNAMENTAL PARKS

- (i) It is respectfully submitted that Respondent No. 1 issued Circular No. DOH/DDH(HQ)/NDMC/2013/338 dated 22 August 2013 ("**Circular dated 22 August 2013**") regarding booking of parks

for the purpose of public functions. As per clause 2 of the said Circular, no booking of any function, whether religious or social, can be made in an Ornamental Park. It is pertinent to mention here that the Park cannot be booked online and all the bookings done by Respondent No. 2 have been offline. The same is evident from the list of parks available for online booking in Keshavpuram Zone on the website of Respondent No. 1. Respondent No. 1 has not revealed when the Park was declared an Ornamental Park, however, as per the evidence produced on record by the Applicant, at least since 2019, the Park has been an ornamental park. Importantly, considering the status of the Park as an Ornamental Park, the MCD Commissioner banned holding of any function at the Park by the order dated 5 November 2019. However, Respondent No. 1 is completely ignoring its own policies and orders and allowing Respondent No. 2 to use the Park for the Ramlila event.

- (ii) Respondent No. 1 has relied on clause 2(i) of the Circular in its Supplementary Reply to justify giving permission to Respondent No. 2 for conducting the Ramlila event. However, Respondent No. 1 has conveniently ignored clause 2(iii) of the Circular which categorically states that no ornamental park will be booked for functions. It is submitted that Respondent No. 1 is deliberately going against its own policy in order to favour Respondent No. 1.
- (iii) Respondent No. 1 has further contended that the ban imposed by its Commissioner by the order dated 5 November 2019 on booking of the Park for functions was lifted by the order dated 23 October 2020. Firstly, it is submitted that in view of the Park being an Ornamental Park, the order dated 23 October 2020 could not have been passed by Respondent No. 1. Without prejudice to the aforesaid, as admitted by Respondent No. 1 in paragraph 6 of its Supplementary Reply, the lifting of the ban was only for a period

of one year and it was categorically stated that no function of any nature would be held since the Park is an Ornamental Park. Despite such a categorical statement by the concerned authority of Respondent No. 1, Respondent No. 2 is being given permission every year to conduct the Ramlila event.

- (iv) Respondent No. 1 has further contended in its Supplementary Reply that the permissions have been granted subject to Respondent No. 2 not causing any damage to the Park, taking all statutory approvals, and not having any commercial activity. However, Respondent No. 2 has held the event in blatant violations of these mandatory conditions. Pertinently, Respondent No. 2 has been holding the Ramlila event as a commercial event, not taking any statutory approvals from any of the concerned authorities including the Fire Department and the Traffic Police, not taking any safety precautions, and causing major damage to the Park.

II. RESPONDENT NO. 1 HAS SURREPTITIOUSLY EXECUTED MOU WITH RESPONDENT NO. 2 AND HAS NOT TAKEN ANY ACTION AGAINST RESPONDENT NO. 2 FOR ITS VIOLATIONS

- (i) It is respectfully submitted that Respondent No. 1 has formulated Guidelines for the Adoption of Parks ("**Guidelines**") in 2001, a copy of which has been annexed along with the Original Application as Annexure A-14. As per the Guidelines, an MOU has to be entered into with the adopting agency containing the terms and conditions of the adoption. In the present case, the Applicant made an application to Respondent No. 1 for the adoption and maintenance of the Park by way of letters dated 15 February 2021 and 2 September 2021. The Applicant did not receive a response to the said letters from Respondent No. 1. Unbeknownst to the Applicant, Respondent No. 1, arbitrarily, capriciously, and clandestinely entered into an MOU with

Respondent No. 2 on 25 August 2021, solely to give Respondent No. 2 control of the Park.

- (ii) As per the MOU, the adopting agency, i.e., Respondent No. 2, is permitted to only carry out development and maintenance work of the Park and not permitted to use the Park for any public function. Respondent No. 1 has reiterated the same in paragraph 8 of its Supplementary Reply. However, despite the same and despite the Park being an Ornamental Park, Respondent No. 1 has been consistently granting permissions to Respondent No. 2, showing a clear bias in favour of Respondent No. 2.
- (iii) Further, Respondent No. 2 has failed to properly maintain the Park as evident from the photographs placed on record by the Applicant and the numerous complaints made to Respondent No. 1. Respondent No. 1 had also failed to carry out periodical inspections as required under the MOU. There have been complaints from the Superintendent engaged by Respondent No. 1 itself regarding cutting of trees and damage to the Park by Respondent No. 2. However, Respondent No. 1 has failed to take any action against Respondent No. 2 or terminate the MOU, but, on the other hand, renewed the MOU with Respondent No. 2 after filing of the Original Application by the Applicant.

III. RESPONDENTS ARE IN VIOLATION OF DIRECTIONS OF HON'BLE SUPREME COURT IN M.C. MEHTA JUDGMENT

- (i) Without prejudice to the above, it is submitted that the Respondents are admittedly in violation of the directions passed by the Hon'ble Supreme Court in the order dated 9 December 1996, in *M.C. Mehta v. Union of India*. By way of the said order, the Hon'ble Supreme Court directed that a park could not be used for functions for more than 10 days in a month.

- (ii) The said order has been relied upon and referred to in numerous judgments by the Hon'ble Supreme Court, the Hon'ble High Courts, and this Hon'ble Tribunal. In fact, this Hon'ble Tribunal, relying on the directions in the M.C. Mehta judgment, passed the order dated 13 September 2024 in E.A. 15/2024 titled "Residents Welfare Association v. Horticultural Department, Municipal Corporation of Delhi, West Zone", and held that a park could not be permitted to be used for any function for more than 10 days in a month.
- (iii) Despite the directions of the Hon'ble Supreme Court in the *M.C. Mehta judgment*, Respondent No. 1 gives permission to Respondent No. 2 for using the Park for conducting the Ramlila event beyond the 10-day period. Respondent No. 2 occupies the Park for 40-45 days for the event. The Respondents have tried to justify the glaring violation by stating that the event is only for 10 days, however, the Park is occupied for the rest of the days to facilitate the preparatory and dismantling period. It is submitted that there can be no justification for such a blatant violation. The directions of the Hon'ble Supreme Court are clear and not open to interpretation. It is respectfully submitted that the preparatory and dismantling periods are not excluded from the 10-day timeline. The fact of the matter is that the Respondents are in violation of the clear directions of the Hon'ble Supreme Court. The attempt of the Respondents to carve out an exception to the directions of the Hon'ble Supreme Court is *mala fide* and deserves no indulgence from this Hon'ble Tribunal.

IV. RAMLILA EVENT IS HELD WITHOUT FOLLOWING ANY SAFETY PROTOCOLS

- (i) It is submitted that the Ramlila Event is held by Respondent No. 2 in complete ignorance of any safety protocols,

endangering the lives of the residents, and creating a situation where a disaster is waiting to happen.

(ii) As stated in the Original Application, the Park is small in size, only 0.93 acres, and it has an electric substation adjacent to it. Further, gas pipelines are passing close to the Park. The streets next to the Park are narrow with cars of the residents parked on one side, making it impossible for a fire tender to enter in case of an emergency.

(iii) The Ramlila event is converted into a commercial event with the construction of large temporary structures, and installation of large sound systems and food stalls, and a fee is charged from the residents to attend the event. The effigies are installed close to the electric substation. Further, since the effigies are installed in the Park where they are surrounded by trees and plants, it makes it a big fire hazard. Every time the effigies are burned, the heat emanating from the burning is so strong that it is felt by the residents in their houses, and, further, the ashes from the burning sometimes enter the house. The contentions of Respondent No. 2 that the site of the effigies is away from sensitive areas and that all safety precautions, including the presence of fire tenders and coordination with emergency services, are a complete lie, and Respondent No. 2 is put to strict proof of the same. On the other hand, the Applicant has to put photographs on record which show the huge effigies, the surrounding residences, the electric substation, and give a perspective of the safety hazard that the Ramlila event presents.

(iv) It is imperative to mention here that the Applicant is not against the holding of a religious event, however, when it is held at the cost of the safety of the residents, the Applicant is obligated to raise an objection regarding the same. The

Applicant has even suggested an alternate venue, the D Block Park, which is much bigger than the Park in question, and the event can be held in a much safer way at the said park. The same is in the interest of the residents as well as the Respondents. The Applicant represents the residents of D5 and D8 Blocks of Model Town. The Applicant has been in existence since 15 January 2021 as a registered society and presently has more than 200 members. The Applicant has carried out plantation drives, cleanliness drives, stray dogs' vaccination drives, and regularly organizes activities for the benefit of the residents. Apart from the aforesaid, the Applicant employs and manages security guards of the society. Further, the Applicant regularly takes up the matters of the society with the competent authorities for the common interest of the residents, and the present case is an example of the same. In fact, the Applicant was maintaining the Park long before the maintenance of the Park was surreptitiously handed over to Respondent No. 2 by Respondent No. 1. On the contrary, Respondent No. 2 has no standing and is represented by a handful of people who have colluded with Respondent No. 1 to take over the Park.

(v) It is submitted that Respondent No. 1 is bound to act fairly and reasonably and not act arbitrarily as per Article 14 of the Constitution of India. However, in the present case, Respondent No. 1 has acted unfairly, arbitrarily, and unreasonably against the Applicant.

3. **REPLY TO PRELIMINARY SUBMISSIONS AND PARAWISE REJOINDER TO PARAWISE REPLY**

I. The contents of paragraph 1 of Short Reply are a matter of record and hence need no response.

- II. The contents of paragraph 2 of Short Reply are a matter of record and hence need no response.
- III. The contents of paragraph 3 of Short Reply are denied *in toto*, and the Applicant reaffirms the contents of the Original Application.
- IV. The contents of paragraph 4 of Short Reply are denied except wherein specifically admitted. It is denied that the present matter raises a grievance against the organisation of religious functions every year at Jawahar Park, as alleged or at all. In the present matter, the Applicant has raised a grievance against organization of any function at the Park by virtue of it being an Ornamental Park and in view of the Circular dated 22 August 2013. The Park has to be maintained as a green space by Respondent No. 1, which is unfortunately not being done. By stating that the present matter is against organisation of religious functions specifically, Respondent No. 1 is trying to portray that the Applicant is against organisation of religious functions. The Applicant is against any function that damages the Park, damages the status of the Park as an Ornamental Park, and restricts the use of the Park for its residents. However, the Applicant is not against religious functions and, therefore, the Applicant has given a suggestion that the event may be held in D Park, which is just 300 meters away from the Park and is bigger in size.
- V. The contents of paragraph 5 of Short Reply are denied. It is denied that in pursuance of the application for adoption of the Park under the MOU scheme by Respondent No. 2, Respondent No. 1 has approved the same after a mutual agreement pertaining to the maintenance and usage of the park, vide letter dated 27.08.2021. The Applicant also made an application for the adoption of the Park in February 2021. However, the same was conveniently ignored. It is only after receiving the application from

the Applicant and apprehending that the Applicant was intending to adopt the Park that Respondent No. 1 entered into the MOU with Respondent No. 2 under Respondent No. 1's Adoption of Park Guidelines. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not being repeated for the sake of brevity.

- VI. The contents of paragraph 6 of Short Reply are denied except wherein specifically admitted. It is not disputed that the validity of the MoU is for a period of 3 years as a matter of standard practice, subject to maintenance and proper utilization of the parks in accordance with law, along with inspection conducted time-to-time. The rest of the contents of the paragraph under reply are a matter of record and hence need no response. However, it is submitted that the MOU has been entered into with Respondent No. 2 in order to favour Respondent No. 2, and Respondent No. 1 had no intention of officially renewing the MOU but of letting Respondent No. 2 continue to maintain the Park till the Applicant filed the Original Application. The MOU was entered into without due application of mind and without following the principles of natural justice. It is the duty of Respondent No. 1 to act fairly and reasonably and not act arbitrarily as per Article 14 of the Constitution of India. However, in the present case, Respondent No. 1 has acted unfairly, arbitrarily, and unreasonably against the Applicant. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

- VII. The contents of paragraph 7 of Short Reply are denied except wherein specifically admitted. It is denied that the existing MoU dated 24.10.2024 of the impugned park was approved as per the due procedure by the competent authority, as alleged or at all. It is denied that the same was done after inspection of the said

park. It is not disputed that the renewal of the MoU is subject to proper maintenance of the park as per the conditions of the MoU, however, Respondent No. 1 failed to carry out the inspections as per the MOU. There is no inspection report placed on record. Further, Respondent No. 1 has to review the MOU annually on the basis of the performance of the adopting agency. However, no such review has been carried out by Respondent No. 1. It is denied that Respondent No.1 has carried out an inspection of the park from time to time, and the park was found to be in proper condition. The pictures have been taken after filing of the Original Application and they have been taken by Respondent No. 2. Hence, it is interesting that Respondent No. 1 is annexing the same photographs and, further, relying on the said photographs to contend that it has carried out inspections. The same is clear evidence of collusion between the Respondents. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

- VIII. The contents of paragraph 8 of Short Reply are false and hence denied. It is denied that regular inspections are done to ensure that the Park is in good condition and maintained properly.
- IX. The contents of paragraph 9 of Short Reply are denied except wherein specifically admitted. It is denied that the park is used by the Respondent No. 2 for the limited purpose of organizing the events, its preparation, and other incidental purposes. It is not disputed for the duration of such utilization, the responsibility of the maintenance and cleanliness of the park is also vested with the Respondent No. 2 by virtue of the MoU. However, the responsibility does not arise just on the basis of the MOU but also on the basis of the fact that Respondent No. 2 organizes the Ramlila event on a large scale in a small park and burns huge

effigies in the Park, right next to the electric sub-station, gas pipelines, and homes of the residents, and it is imperative for Respondent No. 2 to employ safety protocols to protect the residents. Unfortunately, Respondent No. 2 is not performing any of its responsibilities and Respondent No. 1 is turning a blind eye to the same. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

- X. The contents of paragraph 10 of Short Reply are denied except where specifically admitted. It is not disputed that Respondent No. 1 has responded to the complaint raised by the Applicant herein vide letter dated 30.10.2024, informing that there is no illegal encroachment in the said park and the park is well maintained. However, Respondent No. 1 always responds with such bald statements without looking into the concerns of the Applicant and without looking at the evidence presented. Respondent No. 1 is failing to perform its duty by ignoring the pleas of the Applicant, which is the representative body of the residents of D5 and D8 Blocks, Model Town, and acting unfairly and unreasonably to favour Respondent No. 2. It is not disputed that it was also stated that the park was booked for Ramlila from 20.09.24 to 19.10.24 by Respondent No. 2 as a matter of practice and the permission was granted after approval from Competent Authority. However, the same is clearly in violation of Respondent No. 1's policy. Without prejudice to the aforesaid, it is submitted that it also violates the dictum of the Hon'ble Supreme Court in the *M.C. Mehta judgment*. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

- XI. The contents of paragraph 11 of Short Reply are denied except where specifically admitted. It is denied that it is further submitted that the Park is being used for the purpose of organizing Ram Lila since 2013. It is denied that the Ramlila event generates employment and revenue for the local and marginalized sections of society. It is denied that Respondent No.1 is aware and conscious of its responsibility towards the environment and its municipal duties, as alleged or at all. If Respondent No. 1 would have been aware and performing its duties, there would have been no need to file the present Original Application by the Applicant. Unfortunately, Respondent No. 1 is not listening to the pleas of the residents of D5 and D8 Block of Model Town. The same is proven by the fact that Respondent No. 1 is blatantly violating the directions of the Hon'ble Supreme Court in *M.C. Mehta* by admittedly granting permission to Respondent No. 2 to occupy the Park for about 45 days in a year and justifying it by stating that the same is much less than the 120 days in a year. Respondent No. 1 is deriving its own method for circumventing the clear and unambiguous directions of the Hon'ble Supreme Court. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.
- XII. The contents of paragraph 12 of Short Reply are denied except where specifically admitted. It is vehemently denied that regarding the request of the adoption of the park, vide a separate letter dated 30 October 2024, it was informed that since the park was already adopted by Respondent No.2 under the MOU, therefore, the park could not be handed over to D-5 & D-8 RWA Model Town till it is surrendered to MCD. It is submitted that the letter dated 30 October 2024 is in response to the RTI Application dated 12 September 2024, placed on record by the Applicant as

Annexure A-3 to I.A. No. 577/2024. Respondent No. 1 never informed the Applicant regarding the execution of the MOU on its own. It is further submitted that the Applicant had made an application for adoption of the Park as the MOU was coming to an end after expiry of the period of three years and, therefore, it was the duty of Respondent No. 1 to consider the request of the Applicant. However, in a highhanded and biased manner, Respondent No. 1 informed the Applicant that the Park could not be given for adoption till Respondent No. 2 surrendered it. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

- XIII. The contents of paragraph 13 of Short Reply are denied except where specifically admitted. It is denied that it appears that the present OA is an attempt to achieve a personal agenda, and the Applicant has wrongly invoked the jurisdiction of this Hon'ble Tribunal, while the appropriate remedy available to the Applicant lies before the civil court. Respondent No. 1 is making preposterous and nonsensical statements that have no basis. The Applicant has rightly approached this Hon'ble Tribunal to deal with the issue of the Park and the environmental violations by the Respondents.
- XIV. The contents of paragraph 14 of Short Reply are denied.
- XV. The contents of the prayer clause of Short Reply are denied. Respondent No. 1 is not entitled to any of the prayers sought in the Short Reply.
- XVI. The contents of paragraph 1 of Supplementary Reply are a matter of record and hence need no response.
- XVII. The contents of paragraph 2 of Supplementary Reply need no response.

- XVIII. The contents of paragraph 3 of Supplementary Reply are denied except where specifically admitted. It is denied that the Park is occupied for only 10 days. The Park is occupied for 45 days in violation of the *M.C. Mehta judgment*. The contents of the rest of the paragraph are a matter of record.
- XIX. The contents of paragraph 4 of Supplementary Reply are denied except where specifically admitted. It is denied that the Park had been adopted for the purposes of Ramlila as a matter of practice since 2006, which is prior to the issuance of the circular dated 22.08.2013. It is denied that the impugned park was being booked for Ramlila as it falls under clause 2(i) of the circular, which is the category of a park wherein a religious function was being held for at least 5 years. It is denied that the permission was granted for 10 days in a month for two months in the period 2006-2019. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.
- XX. The contents of paragraph 5 of Supplementary Reply are a matter of record and hence need no response.
- XXI. The contents of paragraph 6 of Supplementary Reply are a matter of record, however, it is submitted that, firstly, in view of the Circular dated 22 August 2013 and the order dated 5 November 2019 of the Commissioner, NDMC, no event could have been held at the Park. Secondly, even if Respondent No. 1 lifted the ban, the same was for only a year. In defiance of the said Circular and orders, Respondent No. 1 continues to illegally grant permissions to Respondent No. 2 for organizing the Ramlila event. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

XXII. The contents of paragraph 7 of Supplementary Reply are a matter of record, however, it is submitted that Respondent No. 1 could not have given the permission in violation of its own policies. In this regard, the contents of Preliminary Submissions may be deemed to be incorporated herein as the same are not repeated for the sake of brevity.

XXIII. The contents of paragraph 8 of Supplementary Reply are a matter of record and hence need no response. However, Respondent No. 2 is not complying with the terms of the MOU by organizing the Ramlila event.

XXIV. The contents of paragraph 9 of Supplementary Reply are denied. It is denied that Respondent No. 1 has aspired to fulfil the goal mentioned by the Hon'ble Supreme Court in the *M.C. Mehta judgment*. Respondent No. 1 has not taken any steps in this regard and is, in fact, violating the directions of the Hon'ble Supreme Court.

XXV. The contents of paragraph 10 of Supplementary Reply are denied.

XXVI. The contents of paragraph 11 of Supplementary Reply are denied.



APPLICANT

FILED THROUGH:



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Dated:18.08.2025

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KESHAVPURAM ZONE

....RESPONDENT

AFFIDAVIT

I, Gurdeep Singh, S/o Shri Swran Singh, aged about 70 years, R/o D-5/9, 2nd Floor, Model Town-III, Delhi – 110 009, do hereby solemnly affirm and declare as under:

1. That I am the authorised representative of the Applicant and am conversant with the facts and circumstances of the present case. I am therefore competent to swear this affidavit.
2. That the accompanying Rejoinder has been drafted and filed on instructions of the Applicant and the facts mentioned therein are based on the records obtained by the Applicant and information believed by the Deponent to be true and on the legal advice received.



DEPONENT

VERIFICATION:

I, Gurdeep Singh, the above-named Deponent do hereby verify that the contents of my above Affidavit are true and correct to my knowledge and belief and are based on the records available to me. No part of the Affidavit is false, and nothing material has been concealed therefrom.

Verified at New Delhi on this the 18 day of August 2025.



DEPONENT



ATTESTED

NOTARY PUBLIC

