

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH , NEW DELHI

OA No 1308 OF 2024

IN THE MATTER OF :-

BIJENDER KUMAR ..APPLICANT

VERSUS

UTTARAKHAND POLLUTION CONTROL BOARD (UKPCB)
& ORS ..RESPONDENTS

N.D.O.H: 10.11.2025

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NEW DELHI.

APPLICANT

DATED: 08.07.2025

THROUGH

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BEFORE THE HONOURABLE NATIONAL GREEN-TRIBUNAL

**PRINCIPAL BENCH, FARIDKOT HOUSE COPERNICUS MARG NEW DELHI
PIN 110001.**

ORIGINAL APPLICATION NO.1308 OF 2024

Original Application No. 1308 of 2024

**Bijender Kumar
Uttrakhand**

Applicant

Versus

**Uttarakhand Pollution Control Board & Ors.
Respondents**

**REJOINDERS IN REPLY OF RESPONDENTS NO 1. BEHALF OF
APPLICANT**

MOST RESPECTFULLY SHOWETH:-

PARAWISE REPLY ON REPLY OF RESPONDENT 1.IN :-

1. That the contention in para no 1 of respondent are wrong and arbitrary and not acceptable hence denied .

The Contention in para of applicant are same which already mentioned in O.A

Submitted in O.A AND O.A NO 1308/2024

2. That the contention in para no 2. respondents are wrong and arbitrary and not acceptable hence denied .The Contention in para of applicant are same which already. Submitted in O.A AND O.A NO 1308/2024

3. That the contention in para no 3 of respondent are wrong and arbitrary and not acceptable hence denied .

4. The Contention of para no 4. with sub para (a TO i) of respondent are wrong, unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believes which mentioned in this para.

5. That the contention in para no 5 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

6. That the contention in para no 6 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this para. The Contention in para of applicant are same which already. Submitted in O.A AND O.A NO 1308/2024

7. That the contention in para no 7 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

8. That the contention in para no 8 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

9. That the contention in para no 9 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this

10. That the contention in para no 10 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024.

11.That the contention in para no 11 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this

12.That the contention in para no 12 of respondent are wrong and arbitrary and not acceptable hence denied .

13.That the contention in para no 13 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

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**SUBJECT: "REJOINDERS IN REPLY OF RESPONDENTS NO 2.
BEHALF OF APPLICANT**

MOST RESPECTFULLY SHOWETH:-

PARAWISE REPLY ON REPLY OF RESPONDENT 2. IN

1. That the contention in para no 1 of respondent are wrong and arbitrary and not acceptable hence denied .

The Contention in para of 2 are wrong ,arbitrary hence denied. applicant contention are same which already mentioned in oa .

2. That the contention in para no 3. respondents are wrong and arbitrary and not acceptable hence denied .

3. That the contention in para no 4 of P respondent are wrong and arbitrary and not acceptable hence denied .

4. The Contention of para no 5 with sub para (a TO i) of respondent are wrong, unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believed which mentioned in this para.

5. That the contention in para no 6 of respondent are wrong and arbitrary and not acceptable hence denied .

6. That the contention in para no 7. respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024.

REJOINDERS IN REPLY OF RESPONDENTS NO 3. BEHALF OF APPLICANT

MOST RESPECTFULLY SHOWETH:-

PARAWISE REPLY ON REPLY OF RESPONDENT 3 IN :-

1. That the contention in para no 1 of respondent are wrong and arbitrary and not acceptable hence denied .
2. That the contention in para no 1 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024
- 3 "That the contention in para no 2. respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024
4. That the contention in para no 3 of respondent are wrong and arbitrary and not acceptable hence denied .

5 The Contention of para no 4. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this para.

6 . That the contention in para no 5 of respondent are wrong and arbitrary and not acceptable hence denied . Submitted in O.A AND O.A NO 1308/2024

7. That the contention in para no 6 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptably arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this para. The Contention in para of applicant are same which already. Submitted in O.A AND O.A NO 1308/2024

8. That the contention in para no 7 of respondent are wrong and arbitrary and not acceptable hence denied .

9. That the contention in para no 8 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

10.That the contention in para no 9 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this

11.That the contention in para no 10 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024.

12.That the contention in para no 11 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this

13.That the contention in para no 12 of respondent are wrong and arbitrary and not acceptable hence denied .

14.That the contention in para no 13 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

REJOINDERS IN REPLY OF RESPONDENTS NO 3. BEHALF OF APPLICANT

MOST RESPECTFULLY SHOWETH:-

PARAWISE REPLY ON REPLY OF RESPONDENT 3 IN :-

1. That the contention in para no 1 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptably arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believes which mentioned in this para. The Contention in para of applicant are same which already. Submitted in O.A AND O.A NO 1308/2024

2 That the contention in para no 2 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

3. That the contention in para no 3 of respondent are wrong and arbitrary and not acceptable hence denied .

Submitted in O.A AND O.A NO 1308/2024.

4. That the contention in para no 4 of respondent are wrong and arbitrary and not acceptable hence denied .

REJOINDERS IN REPLY OF RESPONDENTS NO 5. BEHALF OF APPLICANT

MOST RESPECTFULLY SHOWETH:- PARAWISE REPLY ON REPLY OF RESPONDENT IN

Submitted in O.A AND O.A NO 1308/2024

1. That the contention in para no 2. of respondent are wrong and arbitrary and not acceptable hence denied .

Submitted in O.A AND O.A NO 1308/2024

2. That the contention in para no 3 of respondent are wrong and arbitrary and not acceptable hence denied .

3. The Contention of para no 4. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this para.

4. That the contention in para no 5 of respondent are wrong and arbitrary and not acceptable hence denied .

Submitted in O.A AND O.A NO 1308/2024

5. That the contention in para no 6 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong, unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believed which mentioned in this para. The Contention in para of applicant are same which already. Submitted in O.A AND O.A NO 1308/2024

6. That the contention in para no 7 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

7. That the contention in para no 8 of respondent are wrong and arbitrary and not acceptable hence denied .Submitted in O.A AND O.A NO 1308/2024

8. That the contention in para no 9 of respondent are wrong and arbitrary and not acceptable hence denied .The Contention of para no 3. with sub para (a TO i) of respondent are wrong unacceptable arbitrary hence specifically and vehemently denied ,the contention of applicant in this para mentioned in this O A 1308/2024 are same and the applicant believe which mentioned in this

9. That the contention in para no 10 of respondent are wrong and arbitrary and not acceptable hence denied .

REJOINDERS IN REPLY OF RESPONDENTS NO 4. BEHALF OF APPLICANT

MOST RESPECTFULLY SHOWETH:- PARAWISE REPLY ON REPLY OF RESPONDENT IN

All Paras of respondent no 4 in reply are denied and NOC was taken in arbitrary manner in respondent no 4 without compiling

the rules and regulation and direction given by Honourable NGT time to time for the land on Doob area as well as land which are in question in O.A. All replies from respondent no 1 to 5 present rejoinder being filed and should be considered with the O.A contention and grounds and judgments on which applicant relied with rules given at the time of N.O.C.

APPLICANT

THROUGH


ADVOCATE NEERAJ KUMAR SHARMA

ADVOCATE REMA RAINA 

ADDRESS :- 484 CHAMBERPATALIA HOUSE COURT

Place : New Delhi 110001.