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**BEFORE THE NATIONAL GREEN**  
**TRIBUNAL, WESTERN ZONE BENCH,**  
**PUNE.**

Appeal No. 48 of 2018.



**BETWEEN:**

The Colva Civic and Consumer Forum  
..... APPELLANT

V/S

Goa Coastal Zone Management Authority  
and ORS. ....RESPONDENTS

**AFFIDAVIT IN REJOINDER ON BEHALF OF**  
**THE APPELLANT TO THE REPLY FILED BY**  
**THE RESPONDENT NO. 1.**

1. I, Mrs. Judith A.B. Almeida, aged 67 years, daughter of late Mr. Joseph Henry Baptista, resident of H.No. 257/1, Bagdem, 3<sup>rd</sup> ward, Colva, Salcete – Goa 403 708, the President of the appellant herein, do hereby state on oath and solemnly affirm as under:
  
2. I say that I am filing this Affidavit in Rejoinder to deal with the averments made by the Respondent No. 1 ( Ceasar Vaz) in his affidavit in reply.
  
3. I say that I have read and understood the contents of the affidavit in reply of Respondent No1 and deny whatever is said in their affidavit in reply which is not in consonance with the facts pleaded in our appeal and nothing not specifically dealt with or denied herein may be construed as deemed to have been admitted by me.

*JA*

4. With respect to the contents of Para 3, I deny that the appeal is erroneous, misconceived. I say that I have not suppressed any material facts.

5. With respect to the contents of Para 4, I further deny that I have attempted to mislead this Hon'ble Tribunal by suppressing facts. I say that appeal is very much maintainable and needs to be heard on merits.

6. With respect to the contents of Para 5, I deny that Mr. Savio Cardozo and Jose Fernandes are associated with me and that they trespassed into the respondent no. 1's property as Government Servants and demanded 3 lakhs Rupees. I say that the said persons are strangers to me and I have never met them, on the contrary they could be associated with the respondent no. 1 the police may have registered this FIR without ascertaining the facts and under the influence of the Respondent no 1

7. With respect to the contents of Para 13, I deny that the respondents have reconstructed the structure with the requisite permissions.

8. With respect to the contents of Para 15, I say that the complaints filed by the appellant were bonafide and accordingly a stop work order cum show cause notice was rightly issued against the respondent no. 1.

9. With respect to the contents of Para 18, I deny that the order dated 05/03/2018 and subsequent approvals dated 03/08/2018 read with communication dated 28/02/2019 are passed by the Respondent no. 2 after



JA

considering all the relevant facts and documents on record.

10. With respect to the contents of Para 19, I say that the appeal filed by the Appellants is bonafide and its not filed with malafide or for any collateral purpose.

11. Considering the averments as stated above I pray that our appeal be allowed.

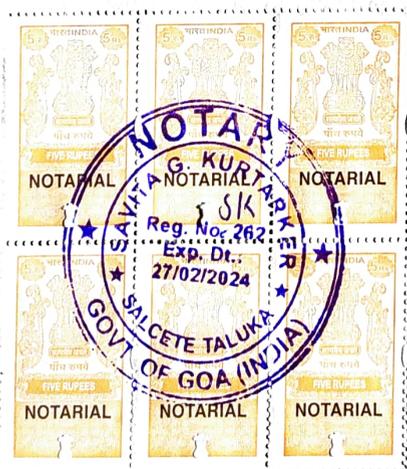
12. I do hereby solemnly affirm that the contents of Paragraphs 1to 11 of this affidavit in rejoinder are true to my personal knowledge and the contents of the remaining Paragraphs of the affidavit in rejoinder are legal submissions, which I believe to be true.



Solemnly affirmed at <sup>Margao</sup> ~~Panaji~~ on 11th day of April 2023.

Margao, Goa.

*[Signature]*  
Deponent



Solemnly affirmed before me by  
Tudith Almeida  
Who is identified to me by  
EPIC No. KNX3050465  
to whom I personally know on  
this 11 day of April 2023

Reg No. 6349 / 2023  
*[Signature]*  
SAVITA G. KURTARKAR  
NOTARY  
MARGAO-GOA