

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
WESTERN ZONE BENCH AT PUNE
EXECUTION APPLICATION No. 22/2023

IN

ORIGINAL APPLICATION No. 70/2017

IN THE MATTER OF:

MR. KARIM JAHANGIR SHAIKH

...APPLICANT

VERSUS

SAHAKAR MAHARISHI SHIVAJIRAO

NARAYANRAO NAGAWADE, SSK LTD. & ORS ...RESPONDENTS

REJOINDER TO THE REPLY OF R-2 & 3-MPCB DATED
16.06.2026 AND REPLY OF R-1-PP DATED 12.06.2026

I, Mr. **KARIM SHAIKH** S/o Late. **JAHANGIR SHAIKH** Age: 51 Years, Occupation: Agriculturist, R/o: Gat No. 52/1/34, Near Shrigonda Factory, Village: Limpangaon, Taluka: Shrigonda, District: Ahmednagar-413726, Maharashtra, do hereby solemnly affirm and state on oath as follows:

1. I state that, the Applicant herein is the Original Applicant in OA No. 70/2017(WZ) and have filed this Execution Application No. 22/2023 (WZ) against the Final Order dated 11.05.2022 passed in OA No. 70/2017(WZ) for non-compliance of said Order by Respondent No. 2 & 3-MPCB.
2. I state that this Hon'ble NGT vide its order dated 11.05.2022 passed in OA No. 70/2014(WZ) in its Para-8 have specifically issued following directions to the MPCB;
 - A) For Past violations, MPCB to take action to fix accountability of the PP, following due process of law.
 - B) Verify the factual status and take necessary coercive measures for current violations;

However, MPCB official failed to take necessary coercive measures for current violations as well as for past violations and always MPCB officials tried their level best

to serve and facilitate the R-1-PP to overcome the violations by racing the paper horses.

- 3. PAST VIOLATIONS:** I state that, this Applicant have specifically provided the past violation from OA and same are summarized in Para NO. 4.5 of Execution Application. Copy of OA is attached at Page NO. 23-36.

Para No. Facts & Ground	Allegations in OA
1	*Well Water used for drinking by Applicant; *Illegal discharge of untreated effluent, Causing pollution & ground water contamination; *Well water not potable;
2	*Untreated Effluent & Spent Wash from Sugar Industry as well as Distillery Unit is stored in 4 No. of chasm/Ponds/Lakes/Water Bodies i.e. (Kaccha Lagoons), Size 3 Acres each
3	*WP No. 1074/2012, Hon'ble BHC, Interim Relief dated 25.11.2014, MPCB to take action on PP-Sugar Industry for discharging untreated Industrial Effluent onto the field/land of Applicant
4	*Illegal Operations without CTO for the year 2015-2016 (Admitted Fact)
6	*MPCB Closure directions dated 14.02.2015 (Typographical error in OA, Correct dated is 04.02.2015), *Non-upgradation of ETP & APC System *Operations without valid Consents (Remark i.e. for seasons 2014-2015 & 2015-2016)
9	Inadequate ETP to handle/treat the effluent load
10	Untreated effluent is collected in tanks and then discharged on adjacent/ adjoining filed/ land
11	Illegal discharge of untreated effluent; Photographs & videos shooting, Compact Disk (CD) attached
12	*R-1-PP Violated Water (P&P) Act, Air (P&P) Act *Ground Water Pollution, *Untreated effluent contains- Chemicals, Oils, Greases, extremely harmful to Vegetation, human, Animals, Ground Water Contamination, Not useful for animals, Applicant compelled to bring drinking water from 2 Km away in Cans;

13	*Illegal operations of Sugar Plant for November-2016, December-2016, January-2017; *Direct Discharge of untreated effluent on adjoining filed, degradation of Environment and Contamination of Ground Water;
14	*Inadequate ETP; *No treatment of Effluent & direct discharge on ground;
15	*MPCB to monitor ETP & Crushing operations; *MPCB default, deliberately turned eye blind; *MPCB Allow PP to pollute Environment & Contaminate Ground Water;
16	*MPCB not taken action *R-1-PP: No ETP Operations

From the above table, allegations are briefed as below:

3.1 **No Valid CTO-Sugar Unit:**

3.2 **No Valid CTO-Distillery Unit:**

3.3 **PRECEDENT OF HON'BLE NGT & HON'BLE SC ON ILLEGAL OPERATION OF SUGAR INDUSTRY AND DISTILLERY PLANTS:**

NGT Judgment dated 31.01.2019 in OA No. 368/2018

Civil Appeal No. 1587/2019 vide its Order dated 15.02.2019

Imposed compensation of **Rs. 10 Crores** on PP

3.4 **PAST SHOW CAUSE NOTICES, PROPOSED DIRECTIONS, INTERIM DIRECTIONS, FINAL DIRECTIONS SHOWING NON-COMPLIANCES**

Sr.	Date	Particular	Page No.
1.	31.12.2007	Directions	
2.	18.01.2008	Directions	
3.	20.11.2010	Show Cause	
4.	07.02.2011	Proposed Direction	
5.	03.05.2011	Interim Direction	
6.	29.02.2012	Proposal for action	
7.	25.07.2012	Letter-Forfeit BG	
8.	07.08.2012	Proposal-Forfeit BG	
9.	16.08.2012	Directions	
10.	23.11.2012	Conditional Restart	
11.	26.02.2013	Directions Voluntary Closure	

12.	24.12.2013	Directions	
13.	16.09.2014	Refusal-Distillery	
14.	28.10.2014	Show Cause	
15.	04.02.2015	Directions	
16.	17.04.2015	Conditional Directions	
17.	23.07.2015	Directions	
18.	19.11.2016	Ground Water Remedial Action Plan	
19.	22.06.2017	Joint Committee Visit Report	
20.	09.02.2022	Direction-Distillery	
21.	09.02.2022	Direction-Sugar	

3.5 NON-SCRAPPING OF KACCHA LAGOONS TILL DATE

3.6 SEEPAGE OF SPENT WASH & TRADE EFFLUENT OUTSIDE FACTORY TILL DATE

3.7 NON-SCRAPPING OF OLD BOILERS TILL DATE

4. REJOINDER TO THE REPLY OF R-2 & 3-PP-MPCB: I state that, the MPCB have filed Reply affidavit vide dated 16.06.2026. However the reply affidavits is partly true and partly false, misleading and nothing but lame attempt to help R-1-PP by convenient ignoring to take actions on the past violations of PP and diverting attentions thereby connecting present processing with OA No. 85/2022 to overcome past violations of PP. Moreover, MPCB has issued the closure direction to the PP in non-sessional time. This acts shows dishonest intention of the MPCB officials. That the MPCB have raised following issue in their reply;

4.1 I state that, the contentions of **Para No. 1 & 2** of MPCP affidavit are part of records and deserve no comments at this juncture.

4.2 **MPCB IS ACTING AS MUTE SPECTATOR ON PARA NO. 3.1 TO 3.3 OF WNS ON ISSUE OF PAST VIOLATIONS I.E.**

ILLEGAL OPERATIONS WITHOUT PRIOR CONSENTS: I

state that, there are specific allegations in respect of illegal operations of Industry without valid CTO as stated Para No. 4, 6 & 13 of OA No. 70/2017 (P@27, 28 & 32). Further I state that, MPCB shall compute the Environment Damage Compensation (EDC) for illegal Operations. It is also important to note here that, despite the closure directions issued by MPCB vide dated 04.02.2015, PP have operated the Industry in illegal manner causing irreparable damage to the environment & ecology. Therefore, this Hon'ble NGT may kindly issue direction to the MPCB to submit the EDC computation or as per the NGT Act, this tribunal shall impose & recover the same from PP. I state that, MPCB have not replied the Para No. 3.1 to 3.3 of WNS and admitted the violations committed by the PP, but intentionally avoided to submit the EDC calculation. This conduct of the MPCB officials and PP clearly shows collusion & deep unholy nexus at the cost of Mother Nature. Mere issuance of the Show cause notice, proposed directions, interim direction, closures/ directions under Air Act & Water Act is cannot be said to be action taken for past violations. There has to be strict compliance of the said directions. However, MPCB is failed to take action for restoration and restitution of the area and therefore, there is need to impose heavy amount of EDC of PP and same shall be recovered from PP along with strict strictures against the MPCB officials.

- 4.3 **REJOINDER TO PARA NO. 3 OF MPCB AFFIDAVIT DATED 16.06.2026:** I state that Para No. 3 of MPCB Affidavit dated 16.06.2026 is part of record and it is also clear that MPCB is failed to show the action taken by them

against PP to make PP comply the same. Mere issuance of the SCN, PD, ID, Closure/Direction under Water Act & Act without its compliance cannot said to be action taken against PP. That has favoured the habitual polluter conveniently for the reasons best know the MPCB officials.

4.4 REJOINDER TO PARA No. 4 OF MPCB AFFIDAVIT DATED 16.06.2026: NO CONCRETE & CONCLUSIVE ACTION INITIATED BY MPCB AGAINST PP FOR PAST:

That issuance of the show cause notice, proposed direction, interim direction, directions, closures and allowing industry to operate in illegal manner without valid consents and also, allowing to discharge of untreated effluent outside factory as well as without complying the show cause notice, proposed direction, interim direction, directions, closures cannot be said to be action has been taken by the MPCB. That the R-1-PP have continued to commit blatant violations damaging environment and ecology and MPCB only kept chasing paper horses without recovery of EDC. Therefore, MPCB have taken any action to reach the conclusive end in view to stop the pollution of the PP, on the contrary MPCB have conveniently ignored & closed their eyes for pollution of the PP. Therefore, statement made by the MPCB in its **Para No. 4** of Affidavit dated 16.06.2026 is baseless and misleading.

4.5 REJOINDER TO PARA NO. 5 OF MPCB AFFIDAVIT DATED 16.06.2026:

I state that the facts narrated in Para No. 5 regarding transfer of case of Hon'ble High Court to NGT are the part of Records. Further It is important to note that, MPCB have relied on their three affidavits dated 08.03.2013, 02.01.2015 & 12.01.2016, but fortunately in

none of the affidavit MPCB have not shown concrete action for restoration & restitutions of the Area polluted by the PP from illegal operations, discharge of untreated spent wash & effluent, Air pollution, ground water contamination. It is important to note here that, MPCB is trying their level best to cover up their own faults & convenient ignorance towards the pollution of PP. It has become notorious business of MPCB official to issue directions and then to grant the ex-post facto consent, despite non-Compliance by polluter-PP.

4.6 REJOINDER TO PARA NO. 6 OF MPCB AFFIDAVIT

DATED 16.06.2026: I state that the facts narrated in Para No. 6 are the part of Records and deserve no comment at this juncture as this facts have no impact on merit of the matter.

4.7 REJOINDER TO PARA NO. 7 OF MPCB AFFIDAVIT

DATED 16.06.2026: I state that the facts narrated in Para No. 7 are the part of Records and deserve no comment at this juncture as this facts have no impact on merit of the matter.

4.8 REJOINDER TO PARA NO. 8 OF MPCB AFFIDAVIT

DATED 16.06.2026: I state the Para No. 8 of the MPCB affidavit clearly admits that there was serious non-compliance by the PP causing blatant violations resulting into irreparable damage to the environment and ecology. But none of the affidavit shows the actions to the extent of restoration and restitution of the area. MPCB is just collecting the amounts under the garb of BG forfeiture for noncompliance of terms & conditions of Consents, but same are not utilised for the development of environment in same

area and MPCB is enjoying this money for their administrative expenses of board officers. That the five (5) affidavits dated 12.01.2016, 28.10.2016, 07.11.2016, 14.11.2016, 24.11.2016 filed by MPCB not helped the environment restoration or for the granting relief to the Original Applicant, on the contrary said affidavits are just filed to save MPCB from any adverse Orders of this NGT against MPCB.

4.9 REJOINDER TO PARA NO. 9 OF MPCB AFFIDAVIT

DATED 16.06.2026: I state that the contents of Para No. 9 of MPCB affidavit clearly admits there were past violations by PP causing irreparable damage to the environment and ecology. That MPCB have clearly supported the contention of Applicant, but not computed the EDC for blatant violation.

Rejoinder to Para No. 9(I); Violations of Sugar Industry:

Despite serious violations CTO dated 16.12.2025 has been issued valid upto 31.07.2026. That the MPCB have issued the directions for scrapping of Kaccha lagoons for number of times, but PP have not it scrapped in scientific manner by removing accumulated slurry of untreated spent wash & effluent. On the contrary PP is continuously storing spent wash in this Kaccha lagoon and due to this ground water has been contaminated in the area. This Kaccha lagoon is not used for storing of fresh water at all, this is just false and misleading statement. That the Photographs of these Kaccha lagoons are already placed on records in WNS. Also, untreated/treated effluent stored in open mine in factory premises, OCEMS not in operation, huge emission from boiler stack, again show cause notice dated 06.03.2026

issued, poor ETP maintenance & Operations, not scrapped Kaccha lagoons. These violations have adverse impact on environment and ecology and these violations are at the cost of repetition. That the show cause notice dated 06.03.2026 and proposed directions dated 29.04.2026 are nothing but paper horses put into race of this litigation to avoid harsh order against MPCB.

Rejoinder to Para No. 9 (II); Violations of Distillery Unit:

MPCB issued proposed directions vide dated 21.04.2025 for non-compliance and thereafter, in mechanical manner also issued CTO dated 20.09.2025 valid upto 31.08.2026. MPCB is admitting that MEE & CPU is not in operations, Industry have not scrapped old pent wash storage tank as directed in SCN dated 14.12.2023 and also, PP have not complied PD dated 21.04.2025 till date.

Rejoinder to Para No. 9 (III); Complaints dated December-2025 & February-2026 and MPCB so called action: MPCB have observed that 30 spent wash storage facility found almost full, provided tanker filling arrangement near bio-digester, spent wash filling in tanker was found in operation, 4 to 6 spent wash carrying tankers were found within factory premises, and disposed the spent wash outside & factory premises. MEE & bio-digester not found in operation, disposal of spent wash on land through tanker outside the factory premises. Board issued closure dated 15.06.2026, but same is thrown into dust bin by PP and continued its operations.

Rejoinder to Para No. 9 (IV); Non-scrapping of Kaccha

Lagoon & Storing of untreated effluent: That the MPCB have admitted the allegations from Para No. 3.5 of WNS of Applicant. PP have not scrapped Kaccha lagoon till date, on the contrary untreated/ treated effluent stored into this Kaccha Lagoon. That the conversion of Kaccha lagoon into fresh water storage tank without MPCB permission is totally false episode. Basically there is no such conversion and spent wash is continuously stored into this Kaccha lagoon. That the issuance of proposed direction dated 29.04.2026 is baseless & meaning less episode of MPCB and it is just issued to cover-up the illegal business of MPCB. That since MPCB Closure directions No. ¶d for scientific scrapping, dismantling or levelling of Kaccha lagoon vide dated 22.11.2013 (P@440) fallowed by further MPCB Closure directions No. ¶1 for scientific scrapping, dismantling or levelling of Kaccha lagoon vide dated 16.09.2014 (P@442), PP have not scrapped said lagoons till date. MPCB only on paper action dated 29.04.2026 & 15.06.2026 (¶1 & 2 P@640, ¶1 P@650) clearly establishes the serious non-compliance of non-scrapping of Kachha lagoon causing ground water contamination. That the analysis report dated 26.02.2026 (P@648) of water sample collected from this Kaccha lagoon shows prescribed limit of CTO has been violated by PP, TDS-5455, SS-1290, BOD-5750, Chloride-284.91, COD-18400, Sulphate-81.80. Therefore, EDC shall be computed by this Hon'ble NGT from 22.11.2013 to 15.06.2026.

Rejoinder to Para No. 9 (V); Discharge of Spent wash outside factory: That the MPCB have admitted the allegations from Para No. 3.6 of WNS of Applicant. That the

MPCB have admitted the disposal of spent wash outside factory by tanker, failed to compute the EDC for this environmental degradation. And therefore, this Hon'ble NGT may kindly impose the huge EDC on its own on PP and same may kindly be recovered from PP. That the MPCB analysis report dated 26.02.2026 (P@644-647) of this discharged spent wash are violating the prescribed standard of CTO.

Rejoinder to Para No. 9 (VI); Non-scrapping of Old Boiler:

That the MPCB have false & incorrect statement against the Para No. 3.7 of WNS of Applicant. That the PP processed e-Auction for the same and not scrapped the Old Boiler till date.

Rejoinder to Para No. 9 (VII); EDC Amount: That the MPCB have false & incorrect statement against for computing the EDC Amount and MPCB is misleading this Hon'ble Tribunal. Mere issuance of SCN, PD, ID, Direction under Air & Water Act, Closure, and Disconnection of Electricity & Water Supply does not means action taken. This is case of environmental violation causing irreparable damage to the environment & ecology by PP. That PP is habitual polluter and this high confidence is due to collusion with MPCB Officials. That PP have never complied the terms and condition of Consents, operated industry in illegal manner without CTO, discharged untreated effluent/ spent wash in Kaccha lagoon/ outside the factory by tankers, by water body, not scrapped Kaccha lagoon, Non-operation of ETP, MEE etc. That despite clear cut case of past violations constituting damage to the environment and

ecology, MPCB is avoiding to compute the EDC due to hands in gloves with PP.

4.10 REJOINDER TO PARA NO. 10 OF MPCB AFFIDAVIT

DATED 16.06.2026: That the issuance of closure direction dated 15.06.2026 (P@642-643) to sugar unit which is off session is meaningless. Further despite closure direction dated 15.06.2026 (P@652-653) to the Distillery Unit, PP have not stopped said unit and it is in full fledged operation. Therefore, MPCB is playing tactics of misleading this Hon'ble NGT since last one decade just by raising paper horses and MPCB officials are dancing on the tune of PP.

4.11 This Hon'ble NGT may kindly compute the EDC amount as MPCB is failed to comply the Order and shown disrespect towards the Order of this Hon'ble NGT. Also, this Hon'ble NGT may kindly take judicial note of conduct of MPCB officials.

5. REJOINDER TO THE REPLY OF R-1-PP-M/S.

SMSNSSKL: I state that, the contents of Reply affidavit filed by R-1-PP vide dated 12.06.2026 are false, baseless, misleading and therefore, denied by this Applicant. Also, the reply affidavit is filed to create jugglery of words, confusion etc. That the R-1-PP have raised following issues in its Affidavit:

A)

5.1 **Pleadings in OA:** I state that, the OA No. 70/2017 (WZ) is already placed on record of EA from Page No. 23-26 and in Para No. 4.5 of EA No. 22/2023 (WZ) summary of the pleading has been provided. This Applicant have travelled

beyond the allegations of the OA and this execution is dealing with the past violations to cast the duty of EDC on PP for restoration and restitution of the area, which had been damaged by PP. Therefore, contentions of PP raised in his reply affidavit dated 12.06.2026 are totally false, baseless and misleading and further made such averments out of frustration of getting exposed. This PP is the habitual offender.

- 5.2 **NGT Order Dated 17.06.2025-Permission to bring on record documentary evidence in support of past violation and Allegations of PP in respect of NEW documents/Evidence, Additional Documents, Enlarging scope of Proceedings:** I state that, the contents of Para No. 1, 2 & 3 of R-1-PP affidavit are part of records and deserve no comments. I state that, the contents of **Para No. 4** of R-1-PP affidavit are totally false, baseless and misleading. That PP himself have admitted in his affidavit at Para No. 2 that, this Hon'ble NGT vide its Order dated 17.06.2025 have permitted Applicant to bring on record documentary evidence with respect to past violations. Therefore, this PP cannot create nuisance, moreover all document are documents belong to himself which PP tried to hide from this NGT & MPCB. Annual report of Industry-PP clearly shows huge production and there is illegal operation of industry without valid consent due to closure direction.
- 5.3 **Operations without valid Consent, SCN, PD, ID, Directions, Closures, etc., Non-scrapping of Kaccha Lagoons, Discharge & seepage of spent wash & trade effluent outside factory, non-scrapping of Old Boilers:**

- A) I state that, the contents of **Para No. 5 & 6** of R-1-PP affidavit deserve no comments and same are part of records. Further, allegations levelled against the MPCB officials are based on documentary evidence and from their conduct of convenient ignorance to take action against PP. As stated in above Para, All the pleadings are from OA and nothing new thing has been pleaded. All violations are past violations, which are dramatically overlooked by MPCB for taking action to impose EDC, despite substantial & irreparable damage caused to environment & ecology by PP.
- B) I state that, the contents of **Para No. 7** of R-1-PP affidavit are totally false, baseless and misleading. There specific pleadings in Para No. 4, 6 & 13 of OA No. 70/2017 for illegal operations of Industry without valid Consents and despite closure order dated 04.02.2015. However, this PP have tried his level best to overcome this violation only due to collusion with MPCB officials. Therefore, there is no new ground or expansion of scope of order or proceedings and contents of Para No. 3.1 to 3.3 of WNS filed by Applicant are true and correct.
- C) I state that, the contents of **Para No. 8** of R-1-PP affidavit are totally false, baseless and misleading. That the SCN, PD, ID, Directions, Closures, etc. issued by MPCB time to time were already on records and MPCB in its affidavit dated 16.06.2026 have placed these documents on records. These documents clearly shows there were serious past violation constituting damage to the environment & ecology and therefore, there is need to impose EDC on PP for restitution & restoration of area and contents of Para No. 3.4 of WNS

filed by Applicant are true and correct.

- D) I state that, the contents of **Para No. 9** of R-1-PP affidavit are totally false, baseless and misleading. There is direction of MPCB to scrap the Kaccha lagoons in the year 2013 in scientific manner, However, PP have not scrapped the same and now coming with false & fabricated story of converting said lagoons into pond. That MPCB have not issued any permission for such conversion, basically there is chemical slurry from spent wash and such scrapping is mandatory as per the CPCB guidelines i.e. CERP. Moreover, MPCB vide its affidavit dated 16.06.2026 have clearly admitted that these Kaccha lagoons are not scrapped and there is storage of untreated effluent into these lagoons. Therefore, contents of Para No. 3.5 of WNS filed by Applicant are true and correct.
- E) I state that, the contents of **Para No. 10** of R-1-PP affidavit are totally false, baseless and misleading. MPCB vide its affidavit dated 16.06.2026 have clearly admitted that there is discharge of spent wash and untreated effluent into the mine as well as discharge of spent wash outside the factory by tankers. That the MPCB have also carried out the discharge spent wash analysis and result dated 26.02.2026 are attached to the MPCB affidavit and same shows very high range of various parameters in violations of Consent terms. That the Distillery unit is the ZLD. Therefore, contents of Para No. 3.6 of WNS filed by Applicant are true and correct.
- F) I state that, the contents of **Para No. 11** of R-1-PP affidavit are totally false, baseless and misleading. MPCB vide its

affidavit dated 16.06.2026 have clearly admitted that the PP have obtained proposed auction of these boilers. In fact, these old boilers are not yet scrapped. Therefore, contents of Para No. 3.7 of WNS filed by Applicant are true and correct.

G) I state that, the contents of **Para No. 12** of R-1-PP affidavit are totally false, baseless and misleading. That the chairman of the Industry is the politician and using his all means to harass, torture and humiliate the Applicant. That the discharge of spent wash into Kaccha lagoon and outside factory in vicinity around the farm of this Applicant is only to harass this Applicant and his family.

H) I state that, the affidavit of this Applicant dated 12.06.2026 is nothing but lame attempt to overcome the past violations and to get escape from the liability of EDC.

6. Hence this Rejoinder.

Whatever stated above is true and correct to the best of my knowledge, belief and information, hence, to verify the same I have signed hereunder at Pune.

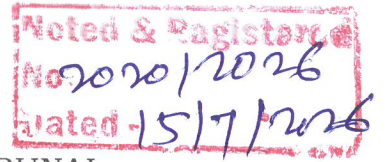
Date: 15.07.2026

Shaikh. J. J.

KARIM J. SHAIKH
(APPLICANT)

Gambhire

TANAJI B. GAMBHIRE
(ADVOCATE FOR APPLICANT)



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
WESTERN ZONE BENCH AT PUNE
EXECUTION APPLICATION No. 22/2023

IN

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IN THE MATTER OF:

MR. KARIM JAHANGIR SHAIKH

...APPLICANT

VERSUS

SAHAKAR MAHARISHI SHIVAJIRAO

NARAYANRAO NAGAWADE, SSK LTD. & ORS. ...RESPONDENTS

AFFIDAVIT IN SUPPORT OF REJOINDER

I, Mr. **KARIM SHAIKH** S/o Late. **JAHANGIR SHAIKH** Age: 53 Years, Occupation: Agriculturist, R/o: Gat No. 52/1/34, Near Shrigonda Factory, Village: Limpangaon, Taluka: Shrigonda, District: Ahmednagar-413726, Maharashtra, do hereby solemnly affirm and state on oath as follows:

1. I state that I am Applicant in the aforesaid matter and I am well aware with the facts and circumstances of the case and in such capacity competent to depose by way of this affidavit.
2. I state that the accompanying Rejoinder to the reply of Respondent No. 1-SMSNNSSKL-PP and Respondent No. 2 & 3-MPCB have been drafted under my instruction and that the facts stated therein are true to the best of my knowledge and belief.
3. I state that the Annexures to this Rejoinder are true copies of their respective originals.

Shri Karim. K. J.
DEPONENT

Affidavit

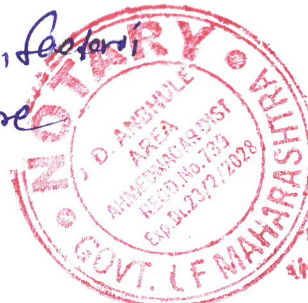
At. No. *2020/2026*
Solemnly affirmed before me by Shri/Smt.

K. J. Shaikh who is identified

by Shri/Smt. *Kavit B. Dharmadhare*

who Personally Know.

Notary Public
Shrigonda



BEFORE ME

J. D. Anbhule

NOTARY MAHARASHTRA
SHRIGONDA, DIST. AHMADNAGAR

15/7/2026