

**BEFORE THE NATIONAL GREEN TRIBUNAL**

**WESTERN ZONE BENCH, PUNE**

O.A. No. 86/2022

**IN THE MATTER OF:**

Pundalik Kushali Velip & Anr.

...Applicants

Versus

The Deputy Conservator of Forests & Ors.

...Respondents

**INDEX**

| <b>S.NO.</b> | <b>PARTICULARS</b>  | <b>PAGE</b>  |
|--------------|---|--------------|
| 1.           | Reply Affidavit on behalf of the Respondent<br>Nos.1 and 2 in reply to the O.A. No. 86/2022                                   | 194 -<br>202 |
| 2.           | <b><u>ANNEXURE-1</u></b><br>The true copy of the First Offence Report dated<br>30.09.2022                                     | 203-204      |
| 3.           | <b><u>ANNEXURE-2</u></b><br>The true copy of the Site Panchnama dated<br>30.09.2022 of Sy. No.23/1, Village Adnem             | 205-206      |
| 4.           | <b><u>ANNEXURE-3</u></b><br>The true copy of statements dated 03.10.2022 of<br>Mr. Mansur Shaikh and Mr. Suraj Baban Ballikar | 207-210      |
| 5.           | <b><u>ANNEXURE-4</u></b><br>The copy of the bail bonds dated 03.10.2022 of<br>Mr. Mansur Shaikh and Mr. Suraj Baban Ballikar  | 211-213      |
| 6.           | <b><u>ANNEXURE-5</u></b><br>The copy of the affidavits dated 01.11.2022 of Mr.<br>Mansur Shaikh and Mr. Suraj Baban Ballikar  | 215-220      |

|     |   |         |
|-----|---|---------|
| 7.  | <b><u>ANNEXURE-6</u></b><br>The true copy of the complaint dated 06.10.2022 received for felling of trees in Sy.no. 23/1, Village Adnem | 221-222 |
| 8.  | <b><u>ANNEXURE-7</u></b><br>The true copy of Site Panchnama dated 06.10.2022 of Sy. No.23/1, Village Adnem                              | 223-225 |
| 9.  | <b><u>ANNEXURE-8</u></b><br>A true copy of the statements dated 07.10.2022 of Mr. Mansur Shaikh and Mr. Suraj Baban Ballikar            | 226-229 |
| 10. | <b><u>ANNEXURE-9</u></b><br>The true copy of the Bail Bonds dated 07.10.2022 of Mr. Mansur Shaikh and Mr. Suraj Baban Ballikar          | 230-233 |
| 11. | <b><u>ANNEXURE-10</u></b><br>The copy of the notice dated 10.10.2022 issued by the office of Respondent no.1 & 2.                       | 234     |
| 12. | Proof of Service  | 235     |

Place: New Delhi

Respondent nos.1 & 2

Dated:9.01.2023 Through

Ms. Ruchira Gupta

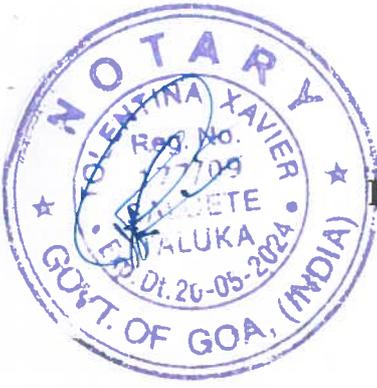
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New Delhi-110014

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Mob: 9810350333



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

O.A. No. 86/2022

**IN THE MATTER OF:**

Pundalik Kushali Velip & Anr. ...Applicants

Versus

The Deputy Conservator of Forests & Ors. ...Respondents

**REPLY AFFIDAVIT ON BEHALF OF RESPONDENT NOS. 1-2**

I, Shri. Prem Kumar R., IFS, Dy. Conservator of Forests, South Goa Division, S/o Shri. Ramesh R., aged about 28 years, R/o E-1 Type Quarter, Forest Colony, Aquem, Margao, Goa, do hereby on solemn affirmation, state as under:

1. That I am holding the post of Dy. Conservator of Forests in the South Goa Division, and being duly authorised on behalf of Respondent Nos. 1 & 2 and well conversant with the facts of the present case, am competent to depose by way of the present affidavit.
2. That I have gone through the Original Application filed by the Applicant and deny each and every statement and averment in the O.A., as if the same has been traversed *in seriatim*, except to the extent admitted hereinafter. It is most respectfully submitted that no averment or contention in the O.A. should be deemed to be admitted for the reason that it has not been specifically denied.

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3. That the present O.A. has been filed with respect to Sy nos. 23/1 to 23/39, 29/1 to 29/58, 30/1 to 30/88, 31/1 to 31/118, 32/1 to 32/127, 33/1 and 34 of Village Adnem, Balli Quepem Taluka, South Goa. The Applicants contend being tenants of the part of the subject property and that the subject properties are natural forests and natural cover. The Applicant has further contended that Sy nos. 23 and 29 have been identified as Private Forest as per the South Goa Forest Division Committee Report and that since April, 2022 there have been cutting down of trees and forestry species etc by Respondent no. 4 who is the last owner of the subject properties having purchased vide sale deed dated 14.05.2012.

4. That at the very outset it is most respectfully submitted that vide reply dated 07.10.2022 by the Office of Deputy Conservation of Forests South Goa Division, Aquem-Margao, in reply to the application dated 19.09.2022 filed by the Applicant under RTI, it has been clarified that Sy nos. 23 & 29 of Adnem village is not a Government Forest; sy no. 23(P) and 29 (P) of Adnem Village is identified as prospective private forest by South Goa Forest Division Committee; and Sy. No. 30, 31, 32 & 33 of Adnem Village is not a government forest nor identified as private forest by State Level Expert Committee and South Goa Forest Division Committee. Though Survey No. 29 (P) has been removed from the list of the Private Forest as per 2<sup>nd</sup> interim report of Review committee under Chairmanship of Chief Conservator of Forests, Panaji. A copy of the said reply dated 07.10.2022 has been annexed by the Applicant to the OA.



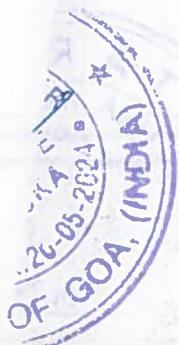
P.

5. That it is further submitted that since April, 2022, the following complaints have been received with respect to the subject property in which due action has been taken by the competent authorities as under:

| S. no | Case   | Location  | Description of Offence                      | Status of Case      |
|-------|--|---|---|---------------------|
| 1.    | 05/RFO/QPM/2022-23<br>Dt:03.10.2022<br>(No written Complaint received; action taken by concern Forest Guard during patrolling.)  | Sy. No. 23/1 of Adnem village Of Quepem Taluka  | Illegal cutting of 01 no. of banyan tree    | Inquiry in progress |
| 2.    | 06/RFO/QPM/2022-23<br>Dt:06.10.2022<br>(Complaint received from Anant B. Gaonkar, r/o H. No. 130, Dautawada, Adnem Quepem Goa on 06.10.2022 regarding illegal cutting of Cashew Trees) | Sy. No. 23/1 of Adnem village Of Quepem Taluka  | Illegal trimming of 23 nos. of cashew trees | Inquiry in progress |
| 3.    | (Complaint received from Pundalik Kushali Naik, r/o H. No. 106, Adnem, Balli, Quepem Goa on 12.10.2022 regarding illegal cutting of trees.)  | Complaint number 2 & 3 are of the same location and offence already registered on 06.10.2022. |   |                     |

Thus, immediate action is taken by Forest Department, under applicable law, as and when any such offence noticed by forest frontline staff and whenever a complaint or information has been received by the answering respondents about any alleged illegal cutting of trees in the Forest areas, then the office of the answering respondents has promptly conducted inspections, registered Offence Cases and taken action as per due process of law. It is further submitted that no permissions/conversion sanads are

f.



being issued with respect to the forest land. In case of any illegal felling of trees, due action is taken under the Preservation of Trees Act, 1984.

6. That against the complaint number 05/RFO/QPM/2022-23 booked in Sy. No. 23/1 of Adnem village Of Quepem Taluka, a First Offence Report was registered on 30.09.2022. That further a Site Panchnama was prepared by the panchas on 30.09.2022 as per the request of the office of the answering respondents and it was observed that one Banyan tree was trimmed and its material was lying at the site. It was also observed that there were high tension electric wires crossing from the site. The true copy of the First Offence Report and the Site Panchnama dated 30.09.2022 is annexed herewith as **ANNEXURE-1** and **ANNEXURE-2**, respectively.

7. That in the statements dated 03.10.2022, Mr. Suraj Ballikar and Mr. Mansur Sheikh, being power of attorney holder of the original land owner Shri Rodney Clotinho D'Silva, *inter alia* stated that they had trimmed the Banyan tree as high tension wires were crossing from the site. Mr. Suraj Ballikar and Mr. Mansur Sheikh executed the Bail Bonds dated 03.10.2022 for Rs.10,000/- for felling of 1 Banyan Tree and undertook to be present for all investigation and trial. The said Mr. Suraj Ballikar and Mr. Mansur Sheikh submitted their affidavits dated 01.11.2022 with respect to the Case No. 05/RFO/QPM/2022-23 for compounding the offence and stating that they are ready to pay the fines and the value of seized materials as imposed under law. The copy of statements dated 03.10.2022 are annexed herewith as **ANNEXURE-3**. The copy of the bail bonds dated 03.10.2022 are annexed herewith as

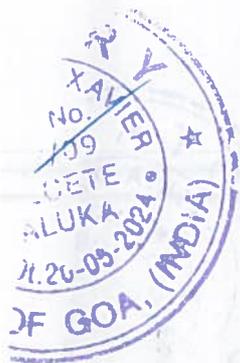


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**ANNEXURE-4.** The copy of the affidavits dated 01.11.2022 are annexed herewith as **ANNEXURE-5.**

8. That an offence case has been registered through a complaint dated 06.10.2022 received from Mr. Harshad Gaonkar regarding illegal cutting of trees in Survey No. 23/1 by Mr. Suraj B. Ballikar and by Mr. Mansur Sheikh. That in response to this complaint, a First Offence Report was registered on 06.10.2022 regarding trimming of 23 cashew trees of Adnem, Bali, Goa. That vide Site Panchnama dated 06.10.2022 by the village panchas it has *inter alia* been observed that 23 cashew trees were trimmed and their material was lying on site and it was not transported. A true copy of the complaint dated 06.10.2022 is annexed herewith as **ANNEXURE-6** and a copy of Site Panchnama dated 06.10.2022 is annexed herewith as **ANNEXURE-7.**

9. That on 07.10.2022 a statement was recorded by Mr. Mansur Sheikh and Mr. Suraj Ballikar stating that they have been booked for offence of cutting 23 cashew trees in Sy. No. 23, 29 and 30. They contented in their statement that the alleged felling activities were not carried out by them and was done by the locals. It was stated that the said trimming of trees has occurred on 05.10.2022 when neither the said power of attorney holders of the owner nor the workers were present on site as it was holiday of Dussehra. It was alleged that a group of few villagers have been doing these kind of activities to make them look like culprits. It was further stated that they informed the Forest Range officer about the felling of trees on 06.10.2022. A copy of the statements dated 07.10.2022 is annexed herewith as **ANNEXURE-8.**



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10. That on 07.10.2022, Mr. Mansur Sheikh and Mr. Suraj Ballikar submitted bail bond dated 07.10.2022 of Rs.10,000/- and undertook to present themselves before the Range Forest Officer, every day for inspection. The copy of the Bail Bonds dated 07.10.2022 is annexed herewith as **ANNEXURE-9**.

11. That a Notice dated 10.10.2022 was issued by the Range Forest Officer, Quepem, Goa to Sh. Suraj Ballikar and Sh. Mansur Shaikh, being the Power of Attorney holders of the Sy. No. 23, 29 and 30 of Adnem Village. It was stated in the said notice that upon verification it was observed various offences are registered in the survey numbers and 4 of which have been compounded with a condition to pay fine and plant 112 trees. It was recorded that even though fine was paid, plantation of trees was not done. Therefore, through the notice Mr. Suraj Ballikar and Mr. Mansur Sheikh were called upon to provide details of the replanting activities. The copy of the notice dated 10.10.2022 is annexed herewith as **ANNEXURE-10**.

**Para-Wise Reply:**

12. That the contents of the para 1 being a matter of record need no reply.

13. That the contents of the para 2 are wrong and denied and in reply thereto the Answering Respondent relies on the submissions made hereinabove.

13. That the contents of the paras 3-5 in so far as are a matter of record, need no reply. The rest of the contents are denied as stated. It is stated that Sy. No. 23(P) and 29 (P) of Adnem village of Quepem taluka is

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identified as prospective private forest by South Goa Forest Division Committee. However, the entire Sy. No. 23, 29 of Adnem Village is not a Government Forest. Further, Sy No. 30, 31, 32 & 33 of Adnem village of Quepem Taluka are neither Government forests nor identified as private forest by State Level Expert Committee and South Goa Forest Division Committee.

14. That the contents of para 6 wrongly numbered as para 3 being a matter of record, need no reply from the Answering Respondent.

15. That the contents of the paras 7 and 8 wrongly numbered as para 4 and 5 are denied as stated and in reply thereto the Answering Respondent relies on the submissions made hereinabove. At present there is no alleged developmental work being carried out at the prospective forest land in subject survey nos. 23 and 29 as alleged by the Applicant.

16. That the contents of the para 9 wrongly numbered as para 6 do not pertain to the answering respondent and hence merit no response.

17. That the contents of the para 10 wrongly numbered as para 7 in so far as are a matter of record, need no reply and the rest of the contents are denied as stated. It is most respectfully submitted that Forest Conservation Act would be applicable on the Forest land and any violation of the provisions of the said Act will entail legal consequences for the violator. However, in the present case, the part of Sy. No. 23 and 29 is identified as prospective Forest Land as stated hereinabove and if and when there has been any violation of the extant rules and regulations then due steps have been and will be taken by the competent authorities against the violators.

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18. That the contents of the grounds raised in the present matter in para 8 (wrongly numbered) are denied as lacking in any material particulars.

19. That the contents of paras 9-10 (wrongly numbered) are denied as stated as far as concerned with the answering respondent. It is denied that the present matter is within limitation as alleged.

20. That the contents of paras 11-12 (wrongly numbered) need no reply.

21. That the contents of para 13 (wrongly numbered) are denied as stated in as much as by their own admission the Applicant became aware of the alleged illegal activity in April, 2022, being tenants of the subject property. However, the present OA was filed in September, 2022.

22. That the contents of paras 14-17 (wrongly numbered) in so far as are a matter of record need no reply.

23. That the contents of paras 18-19 (wrongly numbered) are denied qua the Answering Respondent and it is stated that there is no urgency for the prayed relief as the applicants have themselves approached this Hon'ble Tribunal belatedly. It is most humbly submitted that the Answering Respondent will abide by any directions passed by this Hon'ble Court.

f



24. That the annexures are true copies of their respective originals.

Solemnly affirmed before me by  
Shri /Smt. Pravin Keshavn R.  
who is identified before me by  
Shri /Smt. \_\_\_\_\_  
who is personally known to me

*[Signature]*

TOLENTINA XAVIER  
ADVOCATE & NOTARY  
MARGAO-GOA  
(INDIA)

*[Signature]*  
DEPONENT

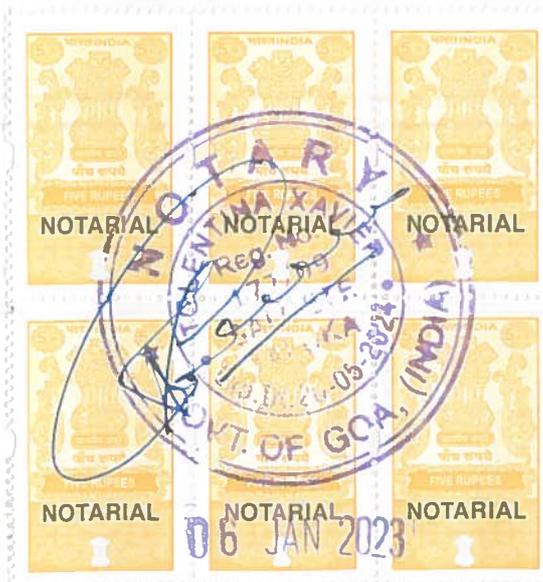
Verification:

*[Signature]*

Verified at Margao, Goa, on this 6<sup>th</sup> day of January, 2023 that the contents of the above affidavit are true and correct to the best of my knowledge, based on the records duly maintained and no part of it is false and nothing material has been concealed therefrom.



*[Signature]*  
DEPONENT



Solemnly affirmed before me by  
Shri /Smt. Pravin Keshavn R.  
who is identified before me by  
Shri /Smt. \_\_\_\_\_  
who is personally known to me

*[Signature]*

TOLENTINA XAVIER  
ADVOCATE & NOTARY  
MARGAO-GOA  
(INDIA)

REG. No: 16/2023  
DATE: 6/1/2023

TRUE COPY

ORIGINAL

स्थळ प्रत

ORIGINAL COPY

पहिली प्रत

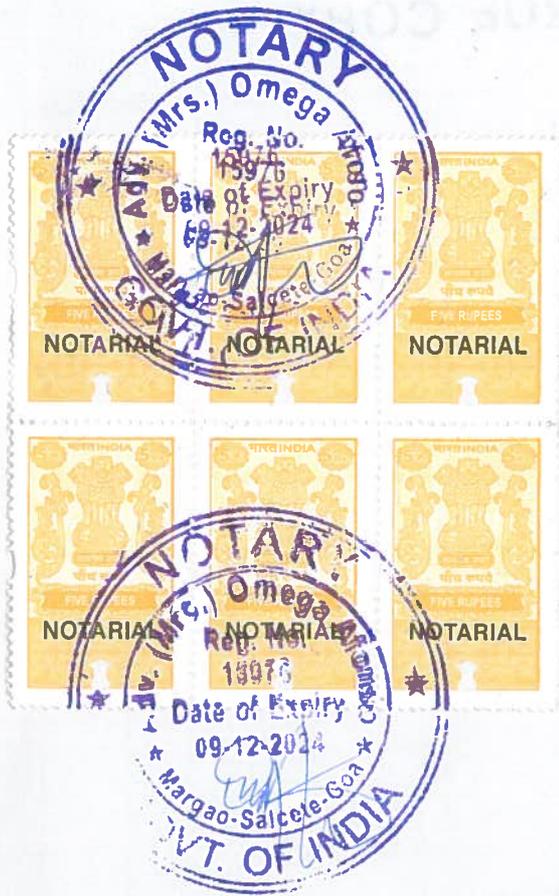
## First Offence Report

## फॉरेस्ट गुन्हा—प्रथम रिपोर्ट

No. 02/2022-23 Date 30/9/2022  
नंबर ता.(Details to be filled by Round Officer)  
(राउंड ऑफिसरने लिहिण्याचा तपशील)Beat Adnem Round Balli  
बीट- राउंड-Date of registration 01/10/2022  
दाखल तारीख-Detail of offence Illegal cutting of One  
गुन्हाचा तपशील- number of Banyana (Vad)  
tree in private property Sgn. 23/1Date of despatch 01/10/2022  
रवाना तारीख-Place of offence Adnem, Balli, Quepem-Goa  
कोठे घडला-Serial No. of offence case in Round  
राउंड गुन्हा अनुक्रम नंबर 02/RA - Balli/2022-23Action taken against the offender if arrested  
कैद्याची व्यवस्था काय केली-Signature, [Signature]  
सही,Round Forester,  
राउंड फॉरेस्टर,Details of material attached  
मुद्देमाल बटकाविला- Firewood = 3.500 N<sup>3</sup>Date of registration  
दाखल तारीख-Action taken  
व्यवस्था काय केली- Drawn panchanamaDivisional order No.  
डिव्हिजनल हुकूम नंबरCamp Adnem, Balli Date 30/9/2022  
मुक्काम ता.Signature,  
सही,Divisional Forest Officer  
डिव्हिजनल फॉरेस्ट ऑफिसरSignature, [Signature]  
सही, (P.6)

Govt. Ptg. Press, Panaji-Goa — 430/200 Bks. — 9/1982





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*[Handwritten Signature]*

Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOA

Reg. No. 336/2023

Date: 06/01/2023



## TRUE COPY

Place = Adnem, Balli  
Date = 30/9/2022  
CELEBRO

## SITE PANCHANAMA

DATE \_\_\_\_\_

PAGE \_\_\_\_\_

| Sr.no. | Name of Panchas       | Age   | Residence                                      | Occupation |
|--------|-----------------------|-------|--|------------|
| 1      | Ravindra Rama Ganekar | 45yrs | H.no.131, Ganekarwada<br>Cavorero, Quepem-Goa. | Dailywages |
| 2      | Rama Nilu Ganekar     | 49yrs | H.no.150, Cupwada,<br>Adnem, Quepem Goa.       | Dailywages |

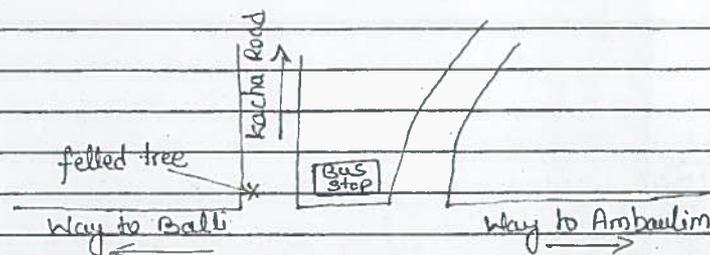
We the above mentioned panchas on being called by the forest officials of Balli Round at private property under Sympul of Adnem village of Quepem Taluka to draw panchanama of illegal felling of one number of Banyan (Vad tree). We agreed for the same and proceeded to site along with him and forest Guard of Adnem Beat.

Upon reaching at the site the forest official explained about the fact of the case. we along with forest officials inspected the site and during inspection we observed that the one number of Banyan (Vad) tree were felled and material was laying at the site. Upon carefully observing it was notice that the beside main trunk remaining branches were old and not freshly cut. Upon observing we notice that electric wires are crossing from the site. Thereafter forest officials in front of us started measuring the length and girth of the felled tree. Up on observation it was clear that no material was transported from the site. Thereafter forest officials started measuring the material of illegal felled of one number of Banyan (Vad) tree and we found that 3.500m<sup>3</sup> of firewood approx.

Detail of the illegal one felled tree in the above area.

| Sr.no. | Species      | Stump Height (M) | Stump Girth (M) |
|--------|--------------|------------------|-----------------|
| 1      | Banyan (Vad) | 0.40             | 3.30            |

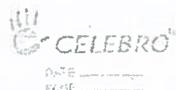
The Rough sketch of the site is as under



GPS Reading = N15°10'16"  
E 74°03'09"



TRUE COPY



The above Panchanama is started at 5:10PM and ended at 5:50PM on 30/9/2022.

The Panchanama is written at the site of an offence. It is read and explained to us in local vernacular language i.e. Konkani. We understood the same and found to be correct and true and no part of it is false. We sign here in below

Before me,  
*[Signature]*  
F. Adnem Bhat  
*[Signature]*  
P. N.

Pancha 1 Ravindra  
Ravindra Rama Gaonkar  
Pancha 2 *[Signature]*  
Rama Nilu Gaonkar



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*[Signature]*  
Adv. (Mrs.) Omega Alonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GO  
Reg. No. 15976/2023  
Date: 06/10/2023



## TRUE COPY

### STATEMENT

Place: - Balli- Quepem

Date:- 03/10/2022

I the undersigned Mr. Mansur Shaikh r/o. H. No. 153/2, Padamol, Sirvoi Quepem-Goa, occupation business, being inquired by Round Forester Balli do hereby state as under;

I say that original land owner Shri. Rodney Clotinho D'silva of Sy. No. 23 sub division 1 to 39, Sy. No. 29 sub division 1 to 58 and Sy. No. 30 sub-division 1 to 88 of Adnem village has given power of attorney to me and Shri. Suraj Baban Ballikar to do all kind of activities in above areas. Now I am one of the lawful attorney of the property.

It is understood from the Round Forester Balli that they have booked an offence for felling of one banyan tree in Sy. No. 23/1 of Adnem village and since I am being an owner of the property, I have been called for recording statement.

I say that one banyan tree was existing near the Balli Adnem main road in our property. I also like to inform you that high tension electric wire is passing across the banyan tree and electric pole is also existing near the banyan tree. As branches of banyan tree was spread over the electric wires and same was damaging the wires, staff of electricity department has trimmed the branches of the banyan tree and materials were kept at the site. They have only trimmed the branches and main stump were intact. As the tree was closed to the road, electric pole and also bus stop, I thought it may pose dangerous to the life and property. So I along with other owner inform the electric staff to cut the entire tree but they refuse to do so. Therefore, to avoid any unavoidable incident we cut the remaining portion of the tree and We kept all the material at the site. As previously we have carried out offences in same property, we were aware that felling permission is required to cut the tree. But since it was close to the road and posing dangerous we cut the tree without permission to avoid any unavoidable incidents. Besides this we have not touch any other tree in the property.

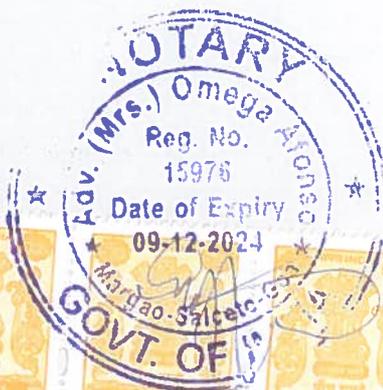
I say that I have carried out offence of felling of one tree without permission and I am agreed to it through I have carried out repeated offence but since the tree was dangerous, this offence case may be compounded as I am ready to pay the fine.

The statement is recorded of my own free will. It is read over to me and translated in local vernacular language i.e. Konkani. It is true and correct for which I sign here in below.

*M. D. Sheikh*  
Manwar Sheikh

Before me

*R. F.*



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

*[Signature]*

Adv. (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOA

Reg. No. 338/2023  
Date: 06/01/2023



**TRUE COPY****STATEMENT**

Place: - Balli- Quepem

Date:- 09/10/2021

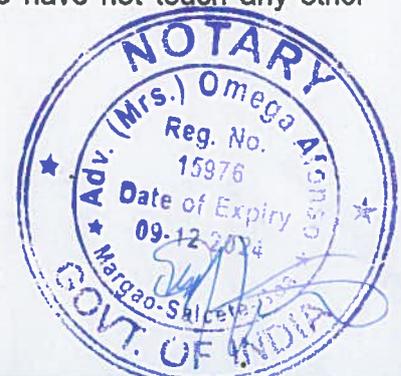
I the undersigned Shri. Suraj Baban Ballikar r/o. H. No. 262, Deulwada Balli Quepem-Goa, occupation business, being inquired by Round Forester Balli do hereby state as under;

I say that original land owner Shri. Rodney Clotinho D'silva of Sy. No. 23 sub division 1 to 39, Sy. No. 29 sub division 1 to 58 and Sy. No. 30 sub-division 1 to 88 of Adnem village has given power of attorney to me and Mr. Mansur Shaikh to do all kind of activities in above areas. Now I am one of the lawful attorney of the property.

It is understood from the Round Forester Balli that they have booked an offence for felling of one banyan tree in Sy. No. 23/1 of Adnem village and since I am being an owner of the property, I have been called for recording statement.

I say that one banyan tree was existing near the Balli Adnem main road in our property. I also like to inform you that high tension electric wire is passing across the banyan tree and electric pole is also existing near the banyan tree. As branches of banyan tree was spread over the electric wires and same was damaging the wires, staff of electricity department has trimmed the branches of the banyan tree and materials were kept at the site. They have only trimmed the branches and main stump were intact. As the tree was close to the road, electric pole and also bus stop, I thought it may pose dangerous to the life and property. So I along with other owner inform the electric staff to cut the entire tree but they refuse to do so. Therefore, to avoid any unavoidable incident we cut the remaining portion of the tree and We kept all the material at the site. As previously we have carried out offences in same property, we were aware that felling permission is required to cut the tree. But since it was close to the road and posing dangerous we cut the tree without permission to avoid any unavoidable incidents. Besides this we have not touch any other tree in the property.

*Suraj*



I say that I have carried out offence of felling of one tree without permission and I am agreed to it through I have carried out repeated offence but since the tree was dangerous, this offence case may be compounded as I am ready to pay the fine.

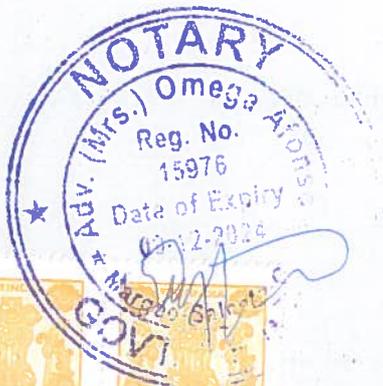
The statement is recorded of my own free will. It is read over to me and translated in local vernacular language i.e. Konkani. It is true and correct for which I sign here in below.

*Bai*

Before me



*23-Dec*  
*R.F.*



Suraj B Ballikar



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

*[Signature]*

Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOIA

Reg. No. 346/2023  
Date: 06/01/2023



TRUE COPY

BAIL BOND.

(Sec. 436 of Cr. P. C.)

I, Shri Suraj Baban Ballikar of H.no.262, Deulwada, Balli, Quepem,  
 having been Arrested/detained without warrant by the Range Forest Officer,  
 Quepem charged with the offence of illegal felling of one banyan tree  
 And required to give in writing and for my attendance, I give in writing herewith  
 and assure on oath that I shall present myself before the Range Forest Officer,  
 Quepem or the J.M.F.C. Quepem on every day on which my investigation or trial  
 is held with regards to such charge, in case my default herein, I bind my self to  
 forfeit to Government the sum of Rs. 10,000/-.

This day 08/10 | 2016

  
 Signature.

I, Shri Vasant P Phaldessai of H.no.291, Balli-Deulwada, Quepem.  
 Hereby declare myself surety for the above mentioned  
 Shri Suraj Baban Ballikar, of H.no.262, Deulwada, Balli, Quepem  
 and I shall produce the said person before the Range Forest Officer, Quepem or  
 before the J.M.F.C. Quepem on every day on which my investigation or trial is  
 held with regards to such charge and in my or his default herein I bind my self to  
 forfeit to the Government the sum of Rs. 10,000/-.

  
 Vasant P Phaldessai  
 09/10/2016

  
 Signature.



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

*[Handwritten Signature]*

Adv (Mrs.) Omega Afonso  
 NOTARY  
 (GOVT OF INDIA)  
 SALCETE-GO8  
 Reg. No. 339/2023  
 Date: 06/01/2023

TRUE COPY



BAIL BOND.

(Sec. 436 of Cr. P. C.)

I, Shri Mansur Shaikh of H.No. 153/2, Padamol, Sirvoi, Quepem  
 having been Arrested/detained without warrant by the Range Forest Officer,  
 Quepem charged with the offence of illegal felling of one banyan tree  
 And required to give in writing and for my attendance, I give in writing herewith  
 and assure on oath that I shall present myself before the Range Forest Officer,  
 Quepem or the J.M.F.C. Quepem on every day on which my investigation or trial  
 is held with regards to such charge, in case my default herein, I bind my self to  
 forfeit to Government the sum of Rs. 10,000/-.

This day 03/10/2020.

Signature.

I, Shri Vasant P Fhaldessai of H.no.291, Deulwada, Balli Quepem  
 Hereby declare myself surety for the above mentioned  
 Shri Mansur Shaikh, H.no.153/2, Padamol, Sirvoi, Quepem Goa.  
 and I shall produce the said person before the Range Forest Officer, Quepem or  
 before the J.M.F.C. Quepem on every day on which my investigation or trial is  
 held with regards to such charge and in my or his default herein I bind my self to  
 forfeit to the Government the sum of Rs. 10,000/-.

Signature.

Range Forest Officer,  
Quepem

TRUE COPY



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCEDO-GOIA

Reg. No. 340/2023

Date: 06/01/2023

TRUE COPY



गोवा GOA

2878 31/10/22  
 मोनसुर शाईक  
 Signature

A 703600



NOEL PARRAS N. P. PARRAS  
 19 Dima Hatillo,  
 MARGAO, GOA  
 GOVT. OF GOA (INDIA)

AFFIDAVIT

I, the undersigned, Shri. Mansur Shaikh, son of Shri. Amrudhin Shaikh, major of age, Indian National, resident of Pedamol Sirvoi Quepem-Goa, do hereby solemnly affirm and declare as under:-



*Handwritten signature*

Cont-2

1. I say that a Forest offence case has been booked against me under case No.05/RFO/QPM/2022-23 dated 03/10/2022 by the Range Forest Officer Quepem Goa.

2. I Say that I agree to compound the said offence and is ready to pay the fines and the value of the seized materials as imposed under the law.

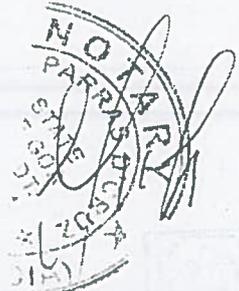
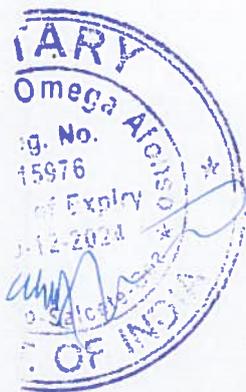
3. I say that I have illegally cut one Banaya Tree existing in private property survey No. 23/1 situated at Adnem village of Quepem Taluka.

4. I say that I sworn this affidavit for the purpose of compounding the Forest Offense under No. 05/RFO/QPM/2022-23 dated 03/10/2022 register against me.

Solemnly affirmed at Mango Quepem on this 1st day of Nov 2022.

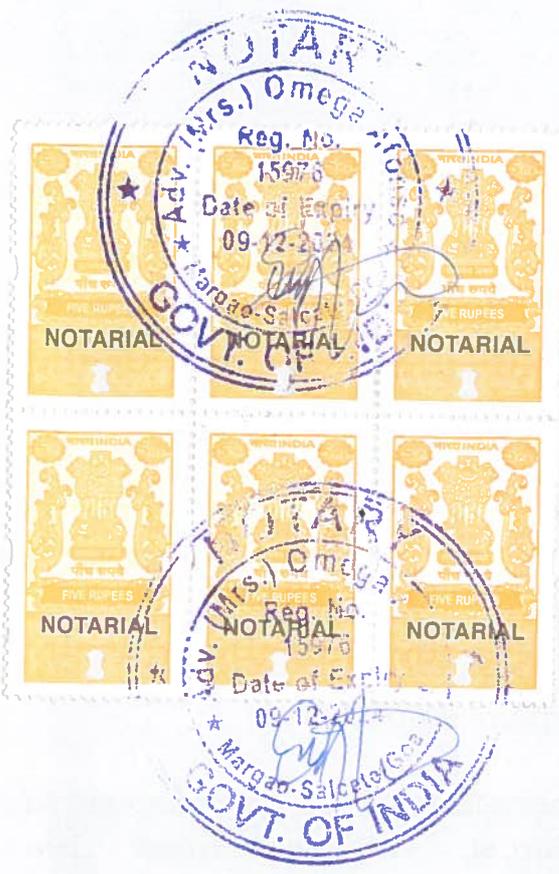
Identified by Me:-  
Identity Card No:-

Deponent  
Aachari Card No 8247 5484 4 204



Solemnly affirmed before me by the deponent / s Who is/are identified to me by Mentioned above Who I personally know on this 01 day of 11 2022 Reg. No. 7338/2022

NOEL PARRA'S D'CRUZ  
NOTARY  
State of Goa (Reg. No. 3511)  
STATE OF GOA (INDIA)  
2326463757 / 042266662



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

Adv (Mrs.) Omega Afonso  
 NOTARY  
 (GOVT. OF INDIA)  
 SALCETE-GOIA

Reg. No. 334 *h023*  
 Date: 06/01/2023



TRUE COPY



गोवा GOA

31/10/22  
 A 649101  
 Name of Purchaser: Suraj Baban Ballikar  
 Name of Bull: Bull



Dr. PEDRU A. P. DIAS  
 18 Dias Radio,  
 QUEPEM GOA  
 Address of the Vendor

**AFFIDAVIT**

I, the undersigned, Shri. Suraj Baban Ballikar, son of Shri. Baban Ballikar, major of age, Indian National, resident of H.No.262, Deulwada Balli Quepem-Goa, do hereby solemnly affirm and declare as under:-

Cont-2



-2-

1.I say that a Forest offence case has been booked against me under case No.05/RFO/QPM/2022-23 dated 03/10/2022 by the Range Forest Officer Quepem Goa.

2. I Say that I agree to compound the said offence and is ready to pay the fines and the value of the seized materials as imposed under the law.

3. I say that I have illegally cut one Banaya Tree existing in private property survey No. 23/1 situated at Adnem village of Quepem Taluka.

4. I say that I sworn this affidavit for the purpose of compounding the Forest Offense under No. 05/RFO/QPM/2022-23 dated 03/10/2022 register against me.

Solemnly affirmed at Margao Quepem on this 11<sup>th</sup> day of Nov 2022.

Identified by Me:-  
Identity Card No:-

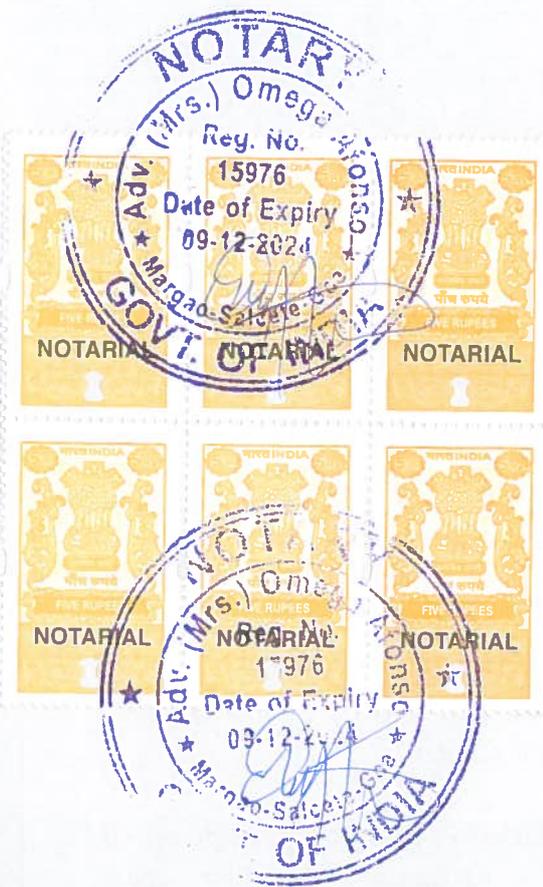
*Soni*  
Deponent

Adhaar Card No: 5255 3986 4712



solemnly affirmed before me by the deponent(s) who is/are identified to me by Mentioned above Who I personally know on this 01 day of 11 2022 Reg. No. 7339/2022

NOEL PARRAS D'ALMEIDA  
NOTARY PUBLIC  
State of Goa (Reg. No. 361)  
STATE OF GOA (INDIA)  
9326863757 / 9122696557



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

Adv. (Mrs.) Omega Afonso  
 NOTARY  
 (GOV. OF INDIA)  
 SALCETE-GOA

Reg. No. 341/2023  
 Date: 06/01/2023



TRUE COPY

Office of the  
Dy. Conservator of Forests  
South Goa Division, Margao-Goa

Inward No. 5390  
B. No. 03  
Page. No. 64  
Date: 19/10/2022

PC.C.F  
9/20  
6/22  
14/10/2022

1432  
14/10/22

From -

Pundalik Kushali Velip,  
H. No. 106, Adnem, Balli,  
Quepem, Goa.

Date - 06-10-2022

To,

1. The Deputy Conservator of Forests,  
South Goa Division,  
Aquem, Margao - Goa 403 601,  
Email: [dcfsouth-forest.goa@nic.in](mailto:dcfsouth-forest.goa@nic.in)

2. The Chief Conservator of Forests,  
Goa Van Bhavan  
Forest Department  
Altinho, Panaji Goa. 403001  
Email: [dcfhq-forest.goa@nic.in](mailto:dcfhq-forest.goa@nic.in)



**Sub - Illegal cutting of trees in Forest Area**

Sir,

There has been unabated cutting of trees in Survey Nos. 23 and 29 of Village Adnem, Balli, Quepem Taluka, South Goa, Goa. The said areas are Forest Cover as per the Government Records, which are with you.

Kindly note that we are tribals in the area and forest dwellers of the said Forest and the said illegal activity directly affects our habitation and rights. Kindly take action against the said activity on urgent basis.

Also kindly let us know if any permission for such tree cutting activity has been obtained.

Thanking you,

Pundalik Kushali Velip

1929  
14/10/22  
for us

19/10  
CF (C)  
Dep (Forest)  
17/10/22  
Df (Wong Ph)  
TMB (P)  
28/10

TRUE COPY

No. 3/1/TMB/Complaint/DCF(S)/22-23/ 381

Dated: 31/10/2022.

Copy forwarded to :-

The Range Forest Officer, Quepem to inspect the site and initiate necessary action as per rules in force and submit detail report to this office.

*[Signature]*  
Dy. Conservator of Forests  
South Goa Division,  
Margao Goa.

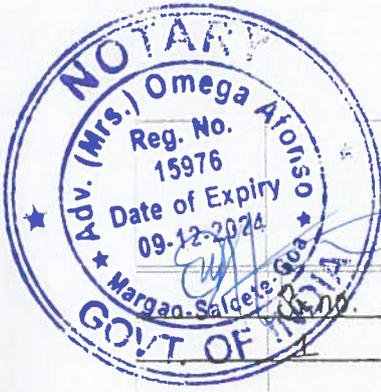
Office of the Range Forest Officer  
..... *Quepem* ..... Range  
Invent: *623*  
I.No. ....  
Page No. *47*  
Date: *01/11/2022*



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

*[Signature]*  
Adv (Mrs) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GO  
Reg. No. *342/2023*  
Date: *06/11/2023*

TRUE COPY



Place = Adnem, Balli

Date = 06/10/2022

DATE \_\_\_\_\_  
PAGE \_\_\_\_\_

## SITE PANCHANAMA

| Sr.no. | Name of Panchas       | Age   | Residence                                     | Occupation |
|--------|-----------------------|-------|---|------------|
| 1      | Ravindra Rama Gaonkar | 45yrs | H.no.131, Gaonkarwad,<br>Cavorem, Quepem-Goa. | Dailywages |
| 2      | Rama Nilu Gaonkar     | 49yrs | H.no.150, Cupnada,<br>Adnem, Quepem Goa.      | Dailywages |

We the above mentioned panchas on being called by the forest officials of Balli Round at private property under Sy.no.23/1 of Adnem village of Quepem Taluka to draw panchanama of illegal trimming of 23Nos. of cashew trees. we agreed for the same and proceeded to site along with him and forest Guard of Adnem Beat.

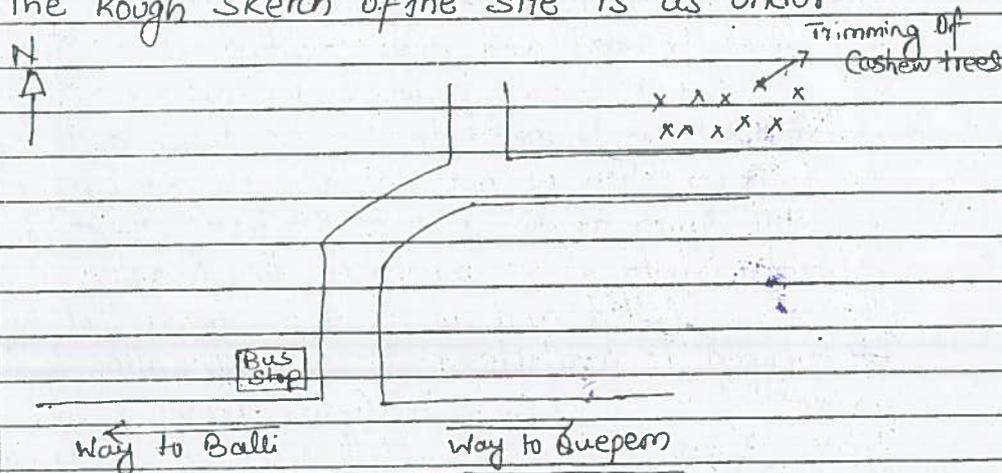
Upon reaching at the site the forest official explained about the fact of the case. We along with forest officials inspected the site and during inspection we observed that the <sup>cutting</sup> trimming several trees were trimmed. Upon careful observation it is clear that only cashew trees were trimmed and remaining part are intact. Thereafter we started counting the no. of trees that were trimmed and upon counting it is clear that 23Nos. of cashew trees were trimmed. We also observed that the material of the trimmed trees were lying at the site and no transportation of material are observed as material is still lying at the site of the trees. Thereafter forest officials in front of us measured the Quantity of material that were felled and in total we found that approx 09000m<sup>3</sup> of firewood is available at the site. Thereafter forest officials in front of us measured the Girth, height of the 23Nos of trees of which trimming of branches has been carried out.

Details of the illegal trimming of 23Nos. Cashew trees in the above area.

| Sr.no. | Species | Height (M) | Girth (M) |
|--------|---------|------------|-----------|
| 1      | Cashew  | 5          | 0.97      |
| 2      | n       | 4          | 0.75      |
| 3      | n       | 5          | 0.68      |
| 4      | n       | 4          | 0.53      |
| 5      | n       | 4          | 0.69      |
| 6      | n       | 3          | 0.72      |
| 7      | n       | 3          | 0.60      |
| 8      | n       | 6          | 1.10      |

|    |        |   |      |
|----|--------|---|------|
| 9  | Cashew | 6 | 1.00 |
| 10 | Cashew | 2 | 0.58 |
| 11 | n      | 3 | 0.80 |
| 12 | n      | 3 | 0.55 |
| 13 | n      | 3 | 0.66 |
| 14 | n      | 3 | 0.55 |
| 15 | n      | 2 | 0.47 |
| 16 | n      | 4 | 0.70 |
| 17 | n      | 4 | 0.60 |
| 18 | n      | 3 | 0.85 |
| 19 | n      | 3 | 0.52 |
| 20 | n      | 4 | 0.62 |
| 21 | n      | 5 | 1.05 |
| 22 | n      | 3 | 0.80 |
| 23 | n      | 5 | 1.10 |

The Rough sketch of the site is as under



The GPS coordinate of the Site is as under  
 N 15° 10' 24"  
 E 74° 03' 07"

The above panchanama is started at 11:00 AM and ended at 12:15 PM on 6/10/2022.

The Panchanama is written at the site of an offence. It is read and explained to us in local vernacular language i.e. Konkani. We understood the same and found to be correct and true, and no part of





it is false. We sign here in below.

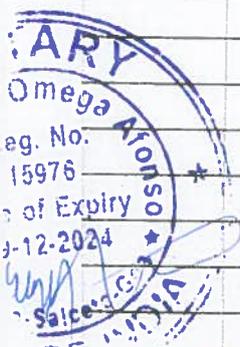
Before me,

Pancha 1 Ravindra  
Ravindra Rama Gaonkar

*Handwritten signature*  
F-4, Acharya Road

~~R. F.~~  
R. F.

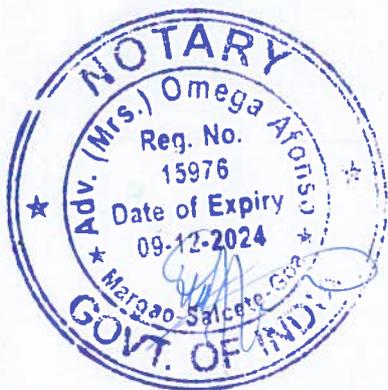
Pancha 2 *RCR*  
Rama Nilu Gaonkar



CERTIFIED TO BE A TRUE  
COPY OF THE ORIGINAL

*Handwritten signature*

Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOA  
Reg. No. 15976/2023  
Date 06/01/2023



TRUE COPY

STATEMENT

Place: - Balli- Quepem

Date:- 07/10/2022

I the undersigned Mr. Mansur Shaikh r/o. H. No. 153/2, Padamol, Sirvoi Quepem-Goa, occupation business, being inquired by Round Forester Balli do hereby state as under;

I say that original land owner Shri. Rodney Clotinho D'silva of Sy. No. 23 sub division 1 to 39, Sy. No. 29 sub division 1 to 58 and Sy. No. 30 sub-division 1 to 88 of Adnem village has given power of attorney to me and Shri. Suraj Baban Ballikar to do all kind of activities in above areas. Now I am one of the lawful attorney of the property.

It is understood from the Round Forester Balli that they have booked an offence for trimming of 23nos of Cashew of trees in Sy. No. 23/1 of Adnem village and since I am being an owner of the property, I have been called for recording statement.

I say that previously whenever any offence has occurred in above areas we have always co-operated and agreed for the offence that has been carried out. But now I would like to inform you that the above of offence of trimming of trees are not carried out either by me or by my other attorney holder. It is to bring to your kind notice that the said trimming of trees was occurred on 05/10/2022 and I came to know about it on 06/10/2022 when my workers informed me about the same. Further on 05/10/2022 neither me or our workers were at the site as it was holiday of dussehra and we were at home for celebration. Further it is to inform you that group of few villagers have been doing these kinds of activities so that we should looked like a culprit. As soon as I come to know to about the said incidents I have informed Range Forest Officer Quepem about the said incident on 06/10/2022. Further I would also like to inform you that the same type of practices was previously followed and villagers may also carry out in future. Further even if we want to do some illegal activities then trimming would have not fulfilling our goal and we would

have gone for clear felling. Thus I want to tell you that the said trimming was not carried out by me or by my other legal attorney holder.

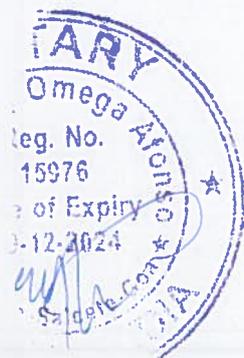
I say that I am aware about the sensitivity of the issue and I know that felling permission is required to fell the trees after carrying out previous offences. As I am the legal owner of the property I will go for felling permission licence if at all I required to fell the trees. As I want to tell you that my most of the activities are in below open areas where no trees are existing.

The statement is recorded of my own free will. It is read over to me and translated in local vernacular language i.e. Konkani. It is true and correct for which I sign here in below.

*Mansur Shikil*

Before me

*R.F.*



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOA

Reg. No. 344/2023  
Date: 06/11/2023

TRUE COPY

STATEMENT

Place: - Balli- Quepem

Date:- 07/10/2022

I the undersigned Shri. Suraj Baban Ballikar r/o. H. No. 262, Deulwada Balli Quepem-Goa, occupation business, being inquired by Round Forester Balli do hereby state as under;

I say that original land owner Shri. Rodney Clotinho D'silva of Sy. No. 23 sub division 1 to 39, Sy. No. 29 sub division 1 to 58 and Sy. No. 30 sub-division 1 to 88 of Adnem village has given power of attorney to me and Mr. Mansur Shaikh to do all kind of activities in above areas. Now I am one of the lawful attorney of the property.

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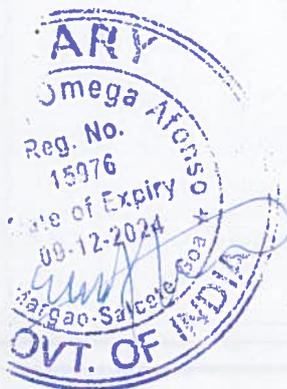
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Before me

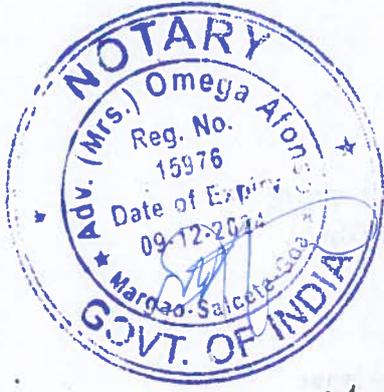
*[Signature]*  
R.F.

*[Signature]*  
Suraj B Ballikar



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

*[Signature]*  
Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOIA  
Reg. No. 343/2023  
Date: 06/01/2023



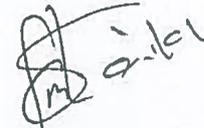
## TRUE COPY

BAIL BOND.

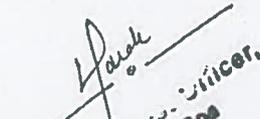
(Sec. 436 of Cr. P. C.)

I, Shri Mansur Shaikh of H.no. 153/2, Padamol, Sirvoi, Quepem having been Arrested/detained without warrant by the Range Forest Officer, Quepem charged with the offence of illegal trimming of 23 nos. of cashew trees And required to give in writing and for my attendance, I give in writing herewith and assure on oath that I shall present myself before the Range Forest Officer, Quepem or the J.M.F.C. Quepem on every day on which my investigation or trial is held with regards to such charge, in case my default herein, I bind my self to forfeit to Government the sum of Rs. 10,000/-.

This day 07/10/2024 2024.

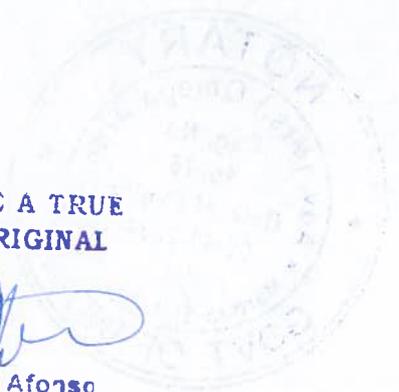
  
Signature.

I, Shri Vasant P Faldessai of H.no. 291, Deulwada, Balli Quepem Hereby declare myself surety for the above mentioned Shri Mansur Shaikh, 8/0 H.no. 153/2, Padamol, Sirvoi, Quepem Goa. and I shall produce the said person before the Range Forest Officer, Quepem or before the J.M.F.C. Quepem on every day on which my investigation or trial is held with regards to such charge and in my or his default herein I bind my self to forfeit to the Government the sum of Rs. 10,000/-.

  
Name: Vasant P Faldessai,  
Officer,  
Quepem-Goa

  
Signature.

TRUE COPY

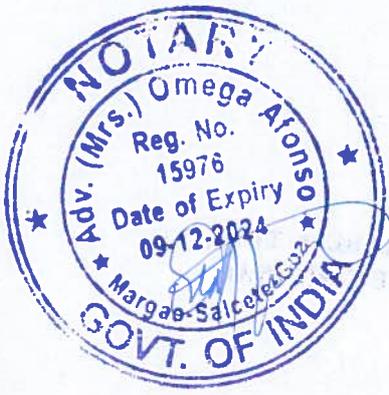


CERTIFIED TO BE A TRUE  
COPY OF THE ORIGINAL

Adv (Mrs.) Omega Afonso  
NOTARY  
(GOVT. OF INDIA)  
SALCETE-GOA

Reg. No. 347 1023  
Date: 06/01/2023





TRUE COPY

BAIL BOND.

(Sec. 436 of Cr. P. C.)

I, Shri Suraj Baban Ballikar of H.No.262, Deulwada, Balli Quepem having been Arrested/detained without warrant by the Range Forest Officer, Quepem charged with the offence of illegal trimming of 23nos of cashew trees And required to give in writing and for my attendance, I give in writing herewith and assure on oath that I shall present myself before the Range Forest Officer, Quepem or the J.M.F.C. Quepem on every day on which my investigation or trial is held with regards to such charge, in case my default herein, I bind my self to forfeit to Government the sum of Rs. 10,000/-.

This day 07/10/2022 2018.

Signature.

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Signature.

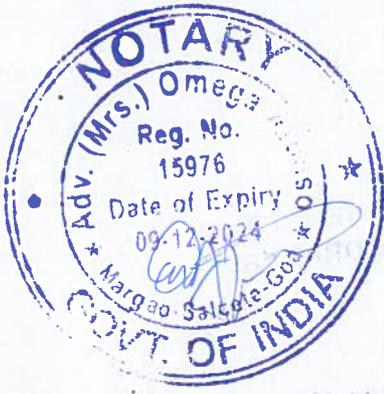
Range Forest Officer,  
Quepem-Goa



CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL

Adv (Mrs.) Omega Afonso  
 NOTARY  
 (GOVT. OF INDIA)  
 SALCETE-GOIA

Reg. No. 349 h023  
 Date: 06/01/2023



TRUE COPY

GOVERNMENT OF GOA  
Forest Department  
OFFICE OF THE  
RANGE FOREST OFFICER  
QUEPEM-GOA

No. 46/Comp/QPM/RFO/2022-23/ 375

Dated: - 10 /10/2022.

NOTICE

Whereas Shri Suraj baban Ballikar and Mr. Mansur sheikh are the power of Attorney holder of the property bearing Sy. No.23, 29 and 30 of Adnem village of Quepem taluka South Goa.

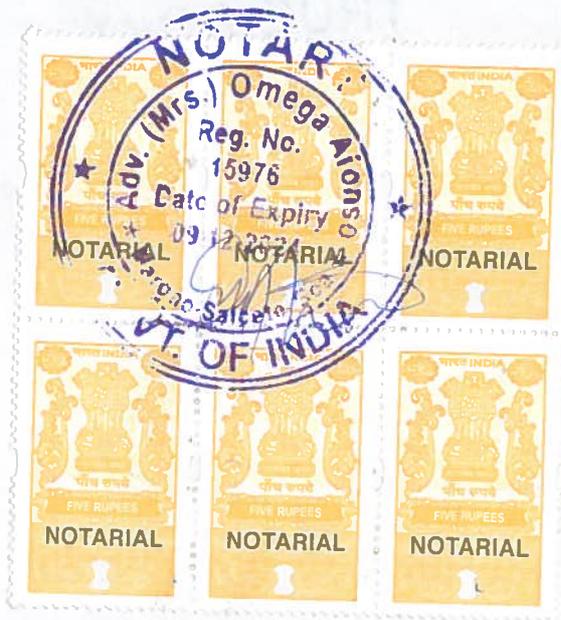
Upon verification it is found that various offence cases are registered in above Survey numbers against different offenders. That 04 offence cases in above survey numbers were compounded with condition to pay fine and replanting of trees. Offence case No.02/KRO/2013-14 dtd.24/07/2013, 16/RFO/QPM/2016-17 dtd. 17/02/2017, 17/RFO/QPM/2016-17 dtd. 20/02/2017 & 05/RFO/QPM/2020-21 dtd.17/06/2020 Compounded vide order No.4/3/2/SGF/13-14/2014-15/1479 dtd.24/07/2014, 4/3/16/SGF/16-17/18-19/972 dtd.29/06/2018, 4/3/17/SGF/2016-17/18-19/669 dtd.31/05/2018 & 4/3/5/SGF/2020-21/21-22/1549 dtd.31/08/2021 compounded with condition to pay the fine and replant 00, 30, 32, 50 respectively i.e. in total 112 Nos. trees. Further while going through the record it is observed that in all above cases you have paid the fine but condition of replanting is not fulfilled.

In view of above it is to inform you to provide the details of replanting activity carried out against the above said offence cases, if not then the same must be carried out and brought to the notice of the undersigned.

(Siddesh Gauda)  
Range Forest Officer,  
Quepem-Goa.

To,

- 1) Shri Suraj Baban Ballikar  
r/o. H. No. 262, Deulwada,  
Balli Quepem-Goa.
- 2) Mr. Mansur Shajkh  
r/o. H. No. 153/2, Padamol,  
Sirvoi Quepem-Goa.



CERTIFIED TO BE A TRUE  
COPY OF THE ORIGINAL

Adv (Mrs.) Omega Afonso  
NOTIARY  
(GOVT. OF INDIA)  
SALCETE-GOA  
Reg. No. 335/2023  
Date: 06/01/2023



Nancy Shah &lt;nancys Shah@chambersofrg.com&gt;

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**SERVICE OF COUNTER AFFIDAVIT OF R1&2 in O.A. NO.86/2022-NGT PUNE**

1 message

**Urvi Kapoor** <urvikapoor@chambersofrg.com>

10 January 2023 at 19:24

To: "fawiamesquitalegal@gmail.com" &lt;fawiamesquitalegal@gmail.com&gt;

Cc: Nancy Shah &lt;nancys Shah@chambersofrg.com&gt;, Harshita Sharma &lt;harshitasharma@chambersofrg.com&gt;, Ruchira Gupta &lt;ruchira@chambersofrg.com&gt;

Dear Ma'am,

Please find attached to this email the Counter Affidavit being filed on behalf of the Respondent no.1 and 2 in the O.A. NO. 86/2022 titled as 'Pundalik Kushali & anr. vs The Deputy Conservator of Forests & Ors.' pending adjudication before NGT, Pune.

Please consider this email as service and take note accordingly.

--  
Urvi Kapoor  
(Advocate)  
Ph: 9873880830

CHAMBERS of  
Ruchira Gupta

E-31, Basement, Jangpura Extension,  
New Delhi - 110014 L 011-43562646

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 **Final Counter Affidavit-R1&2.pdf**  
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