

**NEXT DATE:  
19/09/2025**

HON'BLE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, PUNE

**APPLICATION NO. 76 / 2025 (WZ)**

**B E T W E E N**

Kalpesh Yadav ..... **Applicant**

**V E R S U S**

1. Union of India ..... **Respondents**

2. Principal Secretary, Env.  
Dept., Maharashtra

3. SEIAA – Maharashtra

4. SEAC-I

5. MPCB HO

6. MPCB JD(WPC)

7. MPCB RO Pune

8. PMRDA

9. Collector Pune

**10. Grow India Realcon LLP**

11. VK Design & Projects P L

12. VK Design & Projects P L

REPLY AFFIDAVIT ON BEHALF OF  
**RESPONDENT NO. 10**  
**GROW INDIA REALCON LLP**  
PROJECT PROPONENT

**INDEX ON NEXT PAGE**

Date : **17/09/2025**

Place : Pune

Filed by :



**Advocate Raghunath Mahabal**  
mahabal60@gmail.com +91-7400116222

## INDEX

<b>Sr.</b>	<b>Particulars</b>	<b>Page</b>
1.	Contact Details	440
2.	Diary of Events	444
3.	Abbreviations	445
4.	Memorandum of Application	<b>446- 460</b>

## CONTACT DETAILS

### .... Applicant

#### **1 Kalpesh Chandrakant Yadav,**

Founder/President of Discipline PuneKras Forum

Age: Adult, Occupation: Social work,

R/o: Sr. No. 24/4B/12, Sopan Nagar,

Vadgaonsheri, Pune- 411014

Email ID : kalpeshyadav0007@gmail.com

Phone : 9623337777,

### VERSUS

### .... Respondents

#### **1 Union of India**

Ministry of Environment, Forest and Climate Change

Paryavaran Bhawan, CGO Complex,

Lodhi Road, New Delhi -110001

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Email ID : secy-moef@nic.in

Phone : 011-24695262

#### **2 The Principal Secretary, Environment Dept**

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Room No. 217, 2nd Floor, Annex Building,

Mantralaya, Mumbai-400032

Thro' : Principal Secretary

Email ID : psec.env@maharashtra.gov.in

Phone : 022-22873845

### **3 State Level Environment Impact Assessment Authority (SEIAA)**

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Mantralaya, Mumbai - 400032

Thro' : member Secretary  
Email ID : seiaa.mha@gmail.com  
Phone : 022-22819517

### **4 State Expert Appraisal Committee (I) Maharashtra (SEAC-I)**

15<sup>th</sup> Floor, New Administrative Building,  
Mantralaya, Mumbai-400032

Thro' : Member Secretary  
Email ID : seacen1@gmail.com  
Phone : 022-22825973

### **5 Maharashtra Pollution Control Board**

Kalptaru Point, 3<sup>rd</sup> floor, Near Sion Circle,  
Opp. Cine Planet Cinema, Sion (E),  
Mumbai - 400022

Thro' : Member Secretary  
Email ID : ms@mpcb.gov.in  
Phone : 022-24020781

### **6 Maharashtra Pollution Control Board**

Kalptaru Point, 3<sup>rd</sup> floor, Near Sion Circle,  
Opp. Cine Planet Cinema, Sion (E),  
Mumbai - 400022

Thro' : Joint Director (WPC)  
Email ID : jdwater@mpcb.gov.in  
Phone : 022-24020781

## **7 Maharashtra Pollution Control Board**

Jog Centre, 3<sup>rd</sup> floor, Mumbai-Pune Old Highway,  
Wakadewadi, Pune - 411003

Thro' : Regional Officer  
Email ID : ropune@mpcb.gov.in  
Phone : 020-25811029

## **8 Pune Metropolitan Region Development Authority, Pune**

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Bhawan, Aundh, Pune-411007

Thro' : Metropolitan Commissioner & CEO  
Email ID : comm@pmrda.gov.in  
Phone : 020-29991277

## **9 Collector of Pune**

As Collector and President of District Environment  
Protection Committee-Pune, Collector office, Bund  
Garden, Pune-411001

Thro' : Collector  
Email ID : collector.pune@maharashtra.gov.in  
rdc.pune-mh@gov.in  
Phone : 020-26123370

## **10 M/S. Grow India Realcon LLP**

Office at:A-102, ICC Trade Tower,Senapati Bapat  
Road, Pine-411016

Project at: Survey No. 282/2, Village Maan  
Tal Mulshi, Dist Pune - 411014

Thro' : Mr. Rajesh K. Goel  
Mr. Jaideep Dhananjay Modak  
Email ID : accounts@kohinoorpune.com

Phone : -

## **11 M/S. Vk Design & Projects Pvt. Ltd**

Ar. Hrishikesh Kulkarni

Office at 5<sup>th</sup> floor, Next Gen Avenue,  
Senapati Bapat Road, Pune -411016

Thro' : Director

Email ID : mail@vkarch.com

Phone : -

## **12 M/S. Vk: E Environmental LLP**

Ar. Hrishikesh Kulkarni

Office at 5, Agarakar Bhavan, Lal Bahadur Shastri  
Road, Navi Peth Pune -411030

Thro' : Partner

Email ID : hvkulkarni@vkarch.com

Phone : -

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<b>DAIRY OF EVENTS</b>
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Sr	Date yy/mm/dd	Particulars
1	2021/06/17	Initial Commencement Certificate (CC) issued by PMRDA.
2	2021/11/17	First Revised Commencement Certificate (CC) issued by PMRDA.
3	2022/12/08	Second Revised Commencement Certificate (CC) issued by PMRDA.
4	2024/02/28	Third Revised Commencement Certificate (CC) issued by PMRDA.
5	2024/05/16	Application for Environmental Clearance (EC) on PARIVESH portal.
6	2024/07/24	Project recommended by SEAC.
7	2024/08/07	Application for 'Consent to Establish' (CTE) submitted.
8	2024/12/05	Consent to Establish (CTE) issued by MPCB.
9	2025/07/09	EC granted by SEIAA.
10	2025/05/08	Original Application (OA 76/2025) filed by Kalpesh Yadav.
11	2025/09/17	Reply Affidavit filed by Grow India Realcon LLP.

## ABBREVIATIONS

Short form	Full Form
CC	Commencement Certificate
CGWA	Central Ground Water Authority
CTE	Consent to Establish
CTO	Consent to Operate
EC	Environmental Clearance
EDC	Environmental Damage Calculation
EIA	Environmental Impact Assessment
EV	Electric Vehicle
FSI	Floor Space Index
HC	High Court
MBBR	Moving Bed Biofilm Reactor
MPCB	Maharashtra Pollution Control Board
NGT	National Green Tribunal
NOC	No Objection Certificate
OA	Original Application
OC	Occupancy Certificate
OWC	Organic Waste Converter
PMRDA	Pune Metropolitan Region Development Authority
RERA	Real Estate Regulatory Authority
RTI	Right to Information
SEAC	State Expert Appraisal Committee
SEIAA	State Environment impact Assessment Authority
STP	Sewage Treatment Plant
SWM	Solid Waste Management
TOD	Transit-Oriented Development
UDPCR	Unified Development control and Promotion Regulations
UoI	Union of India

## **MOST RESPECTFULLY SUBMITTED**

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**1.** I, **Jaideep Modak**, adult, am working as the Partner of the **Respondent No. 10, M/s. Grow India Realcon LLP** (hereafter referred to as "Respondent" in this reply) having office at **A-102, ICC Trade Tower, Senapati Bapat Road, Pune - 411016**, do hereby solemnly affirm and state as under: I have sufficient knowledge of the facts and have gathered the required information from the records.

### **PRELIMINARY SUBMISSIONS**

**2.** The present Reply Affidavit is filed in response to the allegations made in the Original Application (OA 76/2025).

**3. The Respondent states that all allegations and statements made in the OA and IA are denied in their entirety.** The respondent asserts that failing to deny or respond does not imply acceptance of any OA allegations. Respondent has replied based on the documents available at this stage and hence reserves and requests to kindly allow to submit the additional documents and response as will be necessary based on the documents available and submissions made by the other parties.

**4.** The answering Respondent has at all times acted

in **good faith, within the framework of law, and under the supervision of statutory authorities** including SEIAA, SEAC, MPCB and PMRDA.

**5.** The Respondents craves leave and requests to reserve the right to submit the additional reply and information as may be sought at subsequent date and due to need to respond to other affidavits.

## **UNCHALLENGED VALID CTE AND EC**

**6.** Respondent states that the OA is filed on **08/05/2025**. The Respondent was granted the valid 'Consent to Establish' on **05/12/2024**, which is not challenged.

**7.** The respondent submits that 'Environmental Clearance' was granted on **09/07/2025**, subsequent to the filing of this OA. This Environmental Clearance has not been contested in any relevant forum or before the National Green Tribunal after nearly two months.

## **ABOUT THE PROJECT**

**8.** The answering Respondent is developing a residential project "**Welworth Purnam**" at Survey No. 282/2, Village Maan, Taluka Mulshi, District Pune, on a total plot area of **8080 m<sup>2</sup>**.

**9.** The Initial Commencement Certificate dated **08.12.2022** authorized construction of 17,236.69 m<sup>2</sup> (FSI + non-FSI), which was under the 20,000 m<sup>2</sup> threshold; therefore, prior EC was not required according to the applicable law (*Glomore Constructions v/s UOI, Bombay High Court, 24.03.2014*).

**10.** The Respondent states that as per the FSI entitlement at that time as per the prevailing UDPCR 2020 applicable to the region, **there was no legal possibility of buying, obtaining, loading additional FSI or non-FSI on that plot / project** (i.e. 'total covered built-up construction area including FSI and non-FSI'). **The total possible entitlement was not beyond 20000 m<sup>2</sup> in any which way possible OR lawfully anticipated.**

**11.** Subsequently, by revised Commencement Certificate dated **28.02.2024**, under subsequent TOD Regulations (***arising out of proximity to Pune Metro Project***), the project potential increased to **26,627.34 m<sup>2</sup>**, thereby necessitating prior EC for the extra additional proposed construction.

**12.** Accordingly, the answering Respondent applied for EC on **16.05.2024**. The **SEAC recommended** the project on **25.07.2024**, and **SEIAA granted Environmental Clearance on 09.07.2025**. With these subsequent obtaining of EC – which is

unchallenged – this OA has become infructuous.

## **ON CONSENT TO ESTABLISH (CTE)**

**13.** The answering Respondent applied for CTE on **07.08.2024**. MPCB issued **Consent to Establish dated 05.12.2024**, which contained conditions:

- No effective steps without EC.
- Submission of affidavit of compliance.

**14.** The Respondent complied and obtained EC on time. Thus, the allegation that CTE was illegally issued or violated is **baseless**.

## **METHODOLOGY OF HARASSMENT**

**15.** The RTI activists OR environmentalists OR eco-terrorists have a well-planned strategy for harassment. They don't challenge the project in time for remediation of any alleged environmental wrong. They deliberately allow the project to progress so that third party interests are created, huge resources go in the project and lot of investment is made by the bona fide buyers and residents in the project. Only after that, at the last stage of completion of project, they lodge cases, file OA and appeals, make complaints before various forums. Because their purpose is never to prevent or

cure the wrong to environment. The purpose if to harass and gain illegitimately out of such blackmailing.

**16.** In this present case also, the project is nearing completion. The project has been granted EC and CTE. The Respondent has applied for the 'Occupancy Certificate' (OC). The Respondent will be applying for 'Consent to Operate' within a fortnight. As such the applicant has deliberately chosen to file this OA. When an OA is filed or a complaint is pending before the Hon'ble National Green Tribunal, the statutory authorities often refrain from discharging their responsibilities or from considering pending applications for OC or CTO. Even though when there is no stay order OR status quo order, such stay is read between the lines, quote - unquote, making this harassment a profitable business by making NGT forum as a tool. This blocks huge funds of the homebuyers, PP and causes hardship and harassment to all stakeholders. **The Hon'ble National Green Tribunal is urged to take note of this to condemn and discontinue this harassment method.**

## **PARA-WISE REPLY TO ALLEGATIONS**

**17. Allegation: Illegal construction beyond 20,000 m<sup>2</sup> without EC.**

■ **Reply:** Construction up to **17,236.69 m<sup>2</sup>** was

lawfully permissible without EC (*Glomore Constructions*, Bombay HC). Only after TOD revision, EC was required, and Respondent obtained valid EC dated **09/07/2025**.

## **18. Allegation: Suppression and misrepresentation through Architect Certificates.**

■ **Reply:** Architect Certificates reflect **stage-wise progress**. Minor variations occurred due to **ongoing revisions in CC**. These details were provided to SEAC/SEIAA for evaluation. No false information was furnished.

## **19. Allegation: No STP, OWC, Greenbelt, groundwater misuse, etc.**

■ **Reply:**

- **STP:** MPCB CTE mandates **160 CMD MBBR-based STP** for 151 CMD sewage. The system is under execution and will be commissioned before occupancy.
- **Solid Waste:** OWC for 374 kg/day wet waste and segregation for dry waste mandated in CTE and 'Environmental Clearance' Compliance is ensured.

- **Groundwater:** Borewells drilled were exploratory. No operational extraction is undertaken. NOC will be obtained prior to use.
- **Greenbelt/Plantation:** Mandated in EC dated 09.07.2025. Implementation plan is underway.

**20. Allegation: Ex-post facto EC/CTE impermissible in light of *Vanashakti v. UOI*.**

- **Reply:** The project does not rely on ex-post facto approval. The EC was granted **prospectively on 09.07.2025**, after due appraisal and compliance. The ratio in *Vanashakti* (16.05.2025) is fully respected.

**21. Allegation: Connivance of authorities (SEAC, SEIAA, MPCB, PMRDA).**

- **Reply:** All statutory bodies independently appraised the proposal, imposed conditions, and granted approvals. The allegation of "connivance" is **unsubstantiated and defamatory**.

## **LEGAL POSITION**

- 22.** The Hon'ble Bombay High Court in *Glomore Constructions v. UOI* held that **projects below**

**20,000 m<sup>2</sup> do not require EC.**

**23.** The Respondent's initial construction was strictly below the said threshold. Upon expansion beyond 20,000 m<sup>2</sup>, Respondent immediately sought and obtained EC in compliance with law.

**24.** Therefore, **no illegality or violation of EIA Notification, 2006 has occurred.**

## **REBUTTAL TO PRAYERS IN OA**

**25. Demolition of structures:** Not warranted. Construction up to 17,236.69 m<sup>2</sup> was legal. The balance is covered by EC dated 09.07.2025.

**26. Environmental Damage Compensation (₹50+ crores):** No environmental damage has been demonstrated. Systems for STP, OWC, greenbelt are provided under CTE/EC. Hence, compensation is unjustified.

**27. Revocation of CTE:** Uncalled for. Conditions were complied with, and EC has been secured.

**28. Action against Respondent & Officials:** Entire process was transparent and statutory. No case for penal action.

**29. Costs to Applicant:** Misconceived, as allegations are unfounded.

**NON-CONSEQUENTIAL RLEIFS  
VIS-A-VIS GROUNDS**

**30.** Respondent states that applicant has written down each and every condition of 'Environmental Clearance' or 'Consent to Establish' or 'Consent to Operate' and converted that sentence in the negative form, alleging that it was not complied with. Instead of seeking any consequential relief, compensation, or institution, the prayers made are diagonally opposite and totally unconnected with the alleged ground that is pleaded in the original application. As such those are all non-maintainable u/s.15 of the NGT Act.

Sr	Grounds	Consequential Relief	Non-consequential Reliefs
1	Violation of EIA Notification 2006 – Mandatory prior EC was not obtained before construction beyond 20,000 m <sup>2</sup> .	EC should ne applied and obtained with proper EDC identification, quantification, remediation plan	Demolition of illegal structures beyond permissible limits and restoration of site as per condition no.35 of CC dated 28.02.2024.
2	Illegality of Ex-Post Facto Clearances – Ex-post facto EC/CTE is impermissible under environmental jurisprudence and quashed by the Hon'ble Supreme		Environmental Damage Compensation of more than ₹50 crores under the Polluter Pays principle.

Sr	Grounds	Consequential Relief	Non-consequential Reliefs
	Court in Vanashakti v. Union of India (2025).		
3	Suppression and Misrepresentation – PP misled SEIAA, SEAC, and MPCB by concealing actual construction status and submitting false Architect Certificates.	Facts that are upheld by NGT to be misrepresented, concealed, mislead should be placed before SEAC and SEIAA for fresh consideration	Revocation of Ex-Post Facto CTE (05.12.2024) issued by MPCB.
4	Non-Compliance with CTE Conditions – Failure to submit affidavit of compliance; hence CTE liable to be revoked.	The non-complied conditions to be listed out and complied within stipulated period as directed by NGT and EDC for the period during the period of violation OR non-compliance resulting in damage to environment	Action against MPCB officials (including RO, Pune) for negligence and recovery of cost from their salaries.
6	No STP provided for 151 CMD sewage.	STP to be provided for 151 CMD sewage treatment	Action against SEAC, SEIAA, PMRDA officials for intentional negligence in processing EC.
7	No Organic Waste Converter (OWC) for 623 kg/day waste.	OWC to be provided	Action against Respondent No.11 (Architect firm) for issuing false completion certificates.
8	No septic tank for labour camp wastewater (discharge seen in kaccha pit).	Septic Tank to be provided	Award of litigation costs to the Applicant.
9	Extraction of groundwater from 4 borewells without NOC.	NOC from CGWA to be obtained OR penalty to be paid as per their rules	Any other orders in the interest of environmental justice.

Sr	Grounds	Consequential Relief	Non-consequential Reliefs
10	Non-preservation of topsoil; failure to provide greenbelt/tree plantation.	Quantity of such non-preserved top-soil to be quantified and green tree plantation to be done	
11	Connivance of Authorities – MPCB, SEAC, SEIAA, and PMRDA failed to prevent violations despite repeated complaints.	Such nexus should be broken	

### ANNEXURE – PARA-WISE REPLY

Para of OA (Applicant's Allegation)	Reply of Respondent No.10
<p><b>Synopsis / Preamble</b>  – Applicant alleges gross intentional violation of EIA Notification, 2006, Environment (Protection) Act, Water Act, Air Act, etc.</p>	<p><b>DENIED.</b>  The Respondent has complied with all applicable laws. Initial construction was <b>below 20,000 m<sup>2</sup></b>, hence no EC required (<i>Glomore Constructions v. UOI</i>, Bombay HC, 24.03.2014). Upon TOD revision (28.02.2024), Respondent <b>applied for EC (16.05.2024)</b> and obtained <b>EC dated 09.07.2025</b></p>
<p><b>Para 10(A)</b> – MoEF&amp;CC Notification S.O.1533 dated 14.09.2006 mandates prior EC for &gt;20,000 m<sup>2</sup>.</p>	<p><b>NOT DISPUTED.</b>  Respondent acknowledges and has complied by securing <b>prior EC</b> once project exceeded threshold.</p>

<p><b>Para 10(B-E)</b> – Commencement Certificates (2021, 2022, 2024) and Architect Certificates show construction of 23 slabs even before EC.</p>	<p><b>DENIED.</b></p> <p>CC dated 08.12.2022 permitted 17,236.69 m<sup>2</sup>, within exempted limit. Architect Certificates were <b>stage-wise progress reports</b> submitted under RERA. There was no concealment. Revised CC (28.02.2024) mandated EC, and Respondent accordingly applied.</p>
<p><b>Para 10(F-G)</b> – Respondent applied for EC only after substantial construction.</p>	<p><b>CLARIFIED.</b></p> <p>Application for EC submitted on <b>16.05.2024</b> before further expansion. SEAC recommended on <b>25.07.2024</b> and SEIAA granted EC on <b>09.07.2025</b>. Hence, no illegality.</p>
<p><b>Para 11(A-E)</b> – No prior EC; MPCB issued illegal ex post facto CTE; misleading Architect Certificates; affidavit not submitted.</p>	<p><b>DENIED.</b></p> <p><b>CTE dated 05.12.2024</b> contained clear conditions (no effective steps without EC, affidavit to MPCB)</p> <p>Respondent complied and thereafter obtained EC. Certificates reflected ongoing revisions.</p>
<p><b>Para 11(F-L)</b> – No STP, OWC, septic tank, EV charging, groundwater misuse, non-preservation of topsoil, lack of greenbelt.</p>	<p><b>DENIED.</b></p> <ul style="list-style-type: none"> <li>• <b>STP:</b> MPCB CTE mandates 160 CMD MBBR-based STP</li> </ul> <p>Work in progress; to be commissioned before occupancy.</p> <ul style="list-style-type: none"> <li>• <b>OWC &amp; SWM:</b> Provided in EC &amp; CTE conditions.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Labour wastewater:</b> Temporary arrangements; septic tanks being provided.</li> <li>• <b>EV charging:</b> Covered in EC conditions</li> <li>• <b>Groundwater:</b> Only exploratory boreholes; no operational extraction.</li> <li>• <b>Topsoil &amp; Plantation:</b> Addressed in EC specific conditions.</li> </ul>
<b>Para 11(M)</b> – PP colluded with Architect & EIA Consultant; suppression of potential.	<b>DENIED.</b> SEAC & SEIAA independently appraised full potential and still recommended EC. Allegation of collusion is baseless.
<b>Para 12 (Damage to Environment)</b> – PP caused irreversible damage; liable for ₹50 Cr+ EDC.	<b>DENIED.</b> No environmental damage has been demonstrated. Mitigation measures (STP, OWC, greenbelt, water conservation) are in place as per EC/CTE. Imposition of exemplary damages is unjustified.
<b>Para 13 (Locus of Applicant)</b> – Claims as NGO/social worker.	<b>NO COMMENTS</b> – pertains to Applicant’s locus.
<b>Para 14 (Jurisdiction of NGT)</b> – States NGT has jurisdiction u/s 15 NGT Act.	<b>NO COMMENTS</b> – pertains to Tribunal’s jurisdiction.
<b>Para 15 (Cause of Action)</b> – Arises from CC dated 28.02.2024, ex post facto CTE dated 05.12.2024,	<b>CLARIFIED.</b> Cause of action is misconceived. CTE was lawfully issued with

MPCB proposed directions dated 15.05.2025.	conditions, EC applied and obtained, and compliance ensured.
<b>Para 16 (Limitation)</b> – OA filed within 5 years.	<b>NO COMMENTS</b> – pertains to Applicant’s maintainability.
<b>Prayers (A–H)</b> – Demolition, EDC of ₹50 Cr+, revocation of CTE, action against MPCB/SEIAA/Architect, litigation costs.	<b>OPPOSED.</b> <ul style="list-style-type: none"> <li>• <b>Demolition:</b> Unwarranted – lawful construction below 20,000 m<sup>2</sup>; balance regularised with EC.</li> <li>• <b>EDC:</b> No basis – compliance ensured.</li> <li>• <b>Revocation of CTE:</b> Not justified – CTE complied with.</li> <li>• <b>Action against officials/Architect:</b> Allegations baseless.</li> <li>• <b>Costs:</b> Not maintainable.</li> </ul>

### **FINAL CONCLUSION**

The allegations in OA 76/2025 are **factually incorrect and legally untenable**. The Project Proponent has **complied with EC and CTE conditions**, acted transparently, and undertaken all environmental safeguards. The prayers for demolition, compensation, and punitive action deserve outright rejection.

### **PRAYER**

**31.** In view of the above, it is most respectfully

prayed that this Hon'ble Tribunal may be pleased to:

- a) Dismiss the Original Application as **devoid of merits.**
- b) Hold that Respondent No.10 has **complied with EIA Notification, 2006, MPCB CTE, and SEIAA EC.**
- c) Pass such further order(s) as this Hon'ble Tribunal may deem fit in the interest of justice.



IDENTIFIED BY

ADVOCATE

Place: **Pune**  
Date : **17/09/2025**



BEFORE ME

*Modak* x

DEPONENT  
Respondent No. 10

ADV. SATISCHANDRA L. PITALE  
ADVOCATE & NOTARY  
MAHARASHTRA STATE

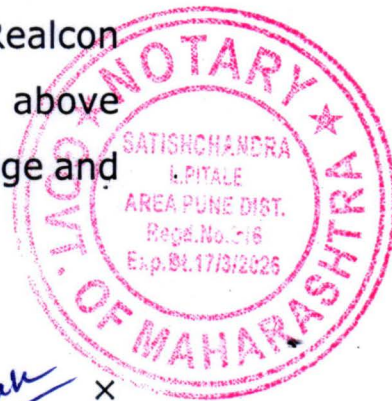
14/3/2025

NOTED AND REGISTERED  
AT SERIAL NO.

VERIFICATION

17 SEP 2025

I, Jaideep Modak, Partner of M/s. Grow India Realcon LLP, do hereby verify that the contents of the above Reply Affidavit are true and correct to my knowledge and belief. Nothing material has been concealed.



IDENTIFIED BY

ADVOCATE

Place: **Pune**  
Date : **17/09/2025**



*Modak* x

Jaideep Modak  
DEPONENT

14/3/2025

NOTED AND REGISTERED  
AT SERIAL NO.

17 SEP 2025



BEFORE ME

*Satischandra L. Pitale*  
ADV. SATISCHANDRA L. PITALE  
ADVOCATE & NOTARY  
MAHARASHTRA STATE



# Proof of Service

Raghunath Mahabal <mahabal60@gmail.com>

## OA 76/2025 : Kalpesh Yadav v/s Uol : 2025-09-17 R-10 Grow India Realcon Reply Affidavit

1 message

Raghunath Mahabal <mahabal60@gmail.com>

18 September 2025 at 16:45

To: National Green Tribunal Pune <ngt-pune@gov.in>, Kalpesh yadav <kalpeshyadav0007@gmail.com>, Adv Nitin Lonkar <nitinlonkar@gmail.com>, Pradnya Bheke <pradnya031994@gmail.com>, "secy-moef@nic.in" <secy-moef@nic.in>, "Principal Secretary Environment Dept. Govt. of Maharashtra" <psec.env@maharashtra.gov.in>, seiaa.mha@gmail.com, seacen1@gmail.com, "ms@mpcb.gov.in" <ms@mpcb.gov.in>, Y B Sontakke <jdwater@mpcb.gov.in>, "ropune@mpcb.gov.in" <ropune@mpcb.gov.in>, comm@pmrda.gov.in, collector pune <collector.pune@maharashtra.gov.in>, rdc.pune-mh@gov.in, accounts@kohinoorpune.com, mail@vkarch.com, Hrishikesh Kulkarni <hvkulkarni@vkarch.com>

Bcc: jaideep modak <jdmodak@gmail.com>, Mahabal Pune <mahabal.pune@gmail.com>

**To: The Hon'ble Registrar, NGT WZ Pune**

cc: All other Respondents as per above email IDs

We are pleased to circulate the enclosed documents.

**(438-460) 2025-09-17 OA 76\_2025 R-10 Grow India Realcon LLP AiR**

These documents are also being uploaded to the NGT website, with fees.

Regards

**Dhananjay Chavan 7038383654**


Office of: **R.B.Mahabal रघुनाथ भालचंद्र महाबळ 74.0011.6222**

**[mahabal60@gmail.com](mailto:mahabal60@gmail.com)**

**Advocate** BE (Mech.), ME (Ind.Management) VJTI Mumbai, LL.M., FIE, Chartered Engineer, Arbitrator IIE, NABET Accredited EC & FAE

B 202, Chandravijay, Phule Road, Mulund East, Mumbai-400081. [https://maps.](https://maps.app.goo.gl/2GS4bQgsD5TTgLoQ6)

[app.goo.gl/2GS4bQgsD5TTgLoQ6](https://maps.app.goo.gl/2GS4bQgsD5TTgLoQ6)

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