

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

IN

ORIGINAL APPLICATION NO. 1191/2024

IN THE MATTER OF:

NARENDRA KUMAR GOSWAMI

... APPLICANT

VERSUS

STATE OF UTTAR PRADESH & OTHERS

... RESPONDENTS

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THROUGH:

SANJEEV K KAPOOR / AAKASH BAJAJ  
HIM/43/1997 D/1395/2013

AVIRAT KUMAR / PRERONA BANERJEE  
D/1133/2014 F/2089/1465/2021

**1043**

*Sania Abbasi*

**SANIA ABBASI**

D/11804/2022

**KHAITAN & CO LLP**

Advocates for Respondent No.9

Max Towers, 7<sup>th</sup> Floors

Sector 16B, Noida, Uttar Pradesh-20131

Email: aakash.bajaj@khaitanco.com

Mob: 99997 77243

New Delhi

Dated: 13.01.2025

BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI

IN

ORIGINAL APPLICATION NO. 1191/2024

**IN THE MATTER OF:**

**Narendra Kumar Goswami**

**...APPLICANT**

**VERSUS**

**State of Uttar Pradesh & Others**

**... RESPONDENTS**

**REPLY AFFIDAVIT ON BEHALF OF THE RESPONDENT NO.9**

I, Kailash Kumar Tibrewalla, son of Late Bularam Tibrewalla, aged about 74 years, by faith Hindu, residing at 64B, Ballygunge Circular Road, Kolkata-700 019, West Bengal do hereby solemnly affirm and say as follows:-

1. I am the Constituted Attorney of Respondent No. 9 herein and am aware of and acquainted with the facts and circumstances of the present case. As such I am competent to swear and affirm the instant affidavit on behalf of Respondent No. 9.
2. The Respondent No. 9 has been served with a copy of the Original Application being O.A. No. 1191 of 2024 purportedly affirmed by one Mr Narendra Kumar Goswami on 23 September 2024 (hereinafter referred to as the "Original Application") and have perused the same.
3. I have read a copy of the Reply Affidavit on behalf of the Respondent No.8 affirmed by one Mr Narayan Das Harsha (hereinafter referred to as the

*Kailash Kumar Tibrewalla*



“Reply Affidavit”) and have made myself fully aware of the said Reply Affidavit and adopt the statements made therein.

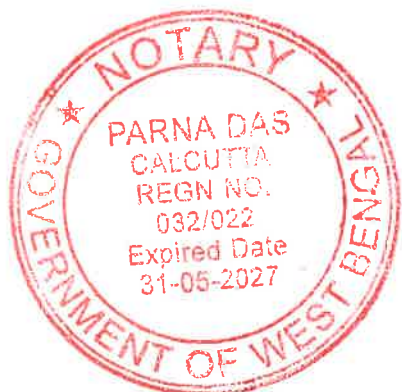
4. In so far as the order dated 6 January 2025 passed by the Hon’ble Supreme Court in WP (C) No.841 of 2024 titled *Narendra Kumar Goswami & Anr. v. Union of India & Ors*, as pleaded in paragraph 11 of the Reply Affidavit filed by Respondent No. 8 is concerned, it is clarified that Senior Advocate, Mr Pinaki Mishra, had appeared for the Respondent No. 14 therein. The order inadvertently records that he appeared for the Respondent No. 13 therein, that is Mr Chandra Kumar Dhanuka.
5. The Respondent No.9 shall not file a separate affidavit dealing with the allegations in the Original Application to avoid multiplicity of proceedings and shall rely on the statements made in the Reply Affidavit.
6. I humbly submit that the Reply Affidavit may be treated as part and parcel of the instant affidavit and the same shall be relied upon by the Respondent No. 9 at the time of hearing of the Original Application.
7. The statements made in paragraph nos. 1 to 5 of the foregoing affidavit are true to my knowledge, those made in paragraph no. 6 are my humble submission to the Hon’ble Tribunal.

Solemnly affirmed by the said  
Kailash Kumar Tibrewalla on  
this the 13 day of January 2025

Kailash Kumar Tibrewalla  
Identified by me  
Pratik Ghosh

Before me

NOTARY



Solemnly affirmed and declared  
before me on identification  
*Parina Das*  
PARINA DAS  
Notary, Calcutta, India  
Govt. of W.B. Regn. No. 032/2022  
Presidency Small Causes Court  
Bar Association at 4th Floor  
Kolkata-700001



13 JAN 2025

**From:** Prerona Banerjee  
**Sent:** 13 January 2025 21:15  
**To:** thendca@gmail.com  
**Cc:** Aakash Bajaj; Pratik Shanu; Sania Abbasi; Labeeb Faaeq  
**Subject:** Narendra Kumar Goswami v State of Uttar Pradesh & Others | ORIGINAL APPLICATION NO. 1191/2024  
**Attachments:** Narendra Kr Goswami vs State of UP and Others Reply of Respondent 9.pdf

Dear Sir

We act for and on behalf of Respondent No. 9 in the captioned proceedings.

Please find attached the Reply Affidavit on behalf of Respondent No.9 which shall be filed before the Hon'ble National Green Tribunal.

This is for your information and record.

Yours sincerely  
Prerona Banerjee  
For Khaitan & Co  
Counsel for Respondent No. 9  
**Prerona Banerjee**  
Associate



Max Towers, 7<sup>th</sup> & 8<sup>th</sup> Floors, Sector 16B, Noida, Gautam Buddh Nagar 201 301, India

T: +91 120 479 1000 | M: +91 91477 68777 | E: prerona.banerjee@khaitanco.com | [Business Card](#) | [www.khaitanco.com](http://www.khaitanco.com)

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