

Before the Hon'ble national Green Tribunal  
(Principal bench), New Delhi  
OA No 860 of 2022

In the matter of:

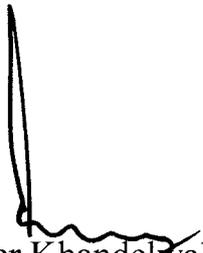
Sachin Tyagi & Anr ..... Applicant

vs

USK Exports Private Limited & Ors.....Respondents

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Sameer Khandelwal  
Director  
M/s USK Exports Private Limited  
**Respondent**

**Before the Hon'ble national Green Tribunal  
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**In the matter of:**

**Sachin Tyagi & Anr ..... Applicant**

**vs**

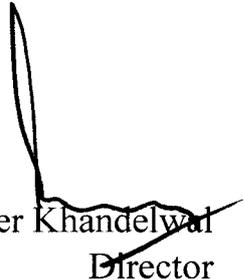
**USK Exports Private Limited & Ors.....Respondents**

**Reply on behalf of the Respondent, M/s USK Export Private Limited in the above matter.**

That I, Sameer Khandelwal S/o Shri Abhai Shanker Khandelwal working as Director in M/s USK Exports Private Limited H-6 G.T Road, Industrial Area N.H. 24 Ghaziabad (U.P), Respondent herein do hereby solemnly affirm and declare as under:

1. That I am working as Director in M/s USK Export Private Limited and am fully conversant with the facts of the case and am duly authorized to submit this reply/objection on behalf of the above-named Respondent.
2. That vide order dated 01.12.2022, this Hon'ble Tribunal had constituted a committee comprising the Respondent has earlier submitted its Counter Affidavit on 27.01.2023 in compliance of the order dated 01.12.2022, passed by the Hon'ble NGT. The Joint Committee, constituted by the Hon'ble NGT has submitted its report on 13.03.2023, a copy of which was supplied to the Answering respondent.
3. That the Compliance Report dated 13.03.2023 filed by the Joint Committee constituted by this Hon'ble Tribunal does not contain any adverse findings against the Answering Respondents.
4. That vide order dated 23.03.2023, this Hon'ble Tribunal directed the Answering Respondents to file their reply and hence this reply.

5. That it is submitted that the application/ complaint has been filed by the applicant/ complainant with vested interest to harass and malign the Answering Respondent for extraneous considerations. On the other hand, the Answering Respondent is a law abiding, well reputed manufacturing company located in an exclusive Industrial Area notified by the UP Industrial Development Corporation and is engaged in Exports of their product after obtaining all requisite permissions including from the State Pollution Control Board.
6. That the Answering Respondent submits that they have been in operation for many years and have not added any additional / new Forging equipment during the last more than 10 years and the Answering Respondent sees no cause of action for the Complainant to raise any objection.
7. That although the Answering Respondent contends that it is not causing any violation of the Water / Air Act or is causing any disturbance to the public, the Answering Respondent is ready and willing to take such further measures as suggested or directed by this Hon'ble Tribunal and/or the committee formed under its direction.
8. That in view of the foregoing submissions, it is most humbly prayed that the application/ complaint filed by the applicant deserves to be dismissed.

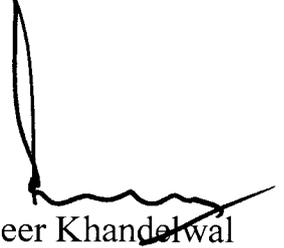


Sameer Khandelwal  
Director

M/s USK Exports Private Limited  
**Respondent**

**Verification:**

Verified at New Delhi on this 12<sup>th</sup> day of May, 2023 that the contents of the above affidavit are true and correct and nothing material has been concealed therein



Sameer Khandelwal  
Director  
M/s USK Exports Private Limited  
**Respondent**