

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

**IA No 35 of 2025  
IN  
Appeal No. 18/2025(WZ)**

Ludovico Goveia

...Appellant

Vs.

GCZMA & Anr.

...Respondents

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Place : Pune

Date: 08/04/2025



Adv. For Respondent No. 2

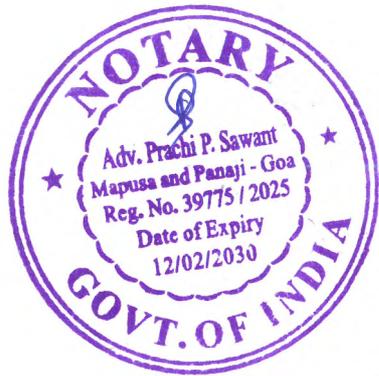
BEFORE THE NATIONAL GREEN TRIBUNAL WESTERN  
ZONE BENCH, PUNE

I.A No. 34/2025 (WZ)

In

Appeal No. 18/2025 (WZ)

I.A. No. 35/2025 (WZ)



Ludovico Goveia ... Appellants

v.

GCZMA & Anr ... Respondents

**REPLY OF THE RESPONDENT NO. 2  
TO THE STAY APPLICATION**

MAY IT PLEASE YOUR LORDSHIPS:

Respondent no. 2 most humbly states and submits as under:

1. The Respondent No.2 has today filed a Reply to the Appeal no. 18/2025 (WZ). For brevity, Respondent no.2 craves leave to refer and rely upon the contents thereon as if specifically set out herein.
2. At the outset, respondent no.2 humbly submit that the conduct of the appellant is far from equitable. The Appellant has not come with clean hands. The

*(Handwritten signature)*

Appellant has made false statements and suppressed material facts and documents which Respondent no. 2 has set out in the Reply.

3. The Appellants dishonesty, defiance and brazen disregard for the law which has been even observed by the Hon'ble High Court and the Hon'ble Supreme Court as stated in my reply to the Appeal disentitles the Appellant from grant of any equitable consideration or relief by this Hon'ble Court.
4. It is not in dispute that the Appellant has committed various illegalities in his property which is in violation of the CRZ law. The magnitude of the illegalities have also been set out in the reply to the Appeal filed by the Respondent no.2.
5. The scale and magnitude of destruction of ecology and the environment carried out and perpetrated by the Appellant as well as the Appellants defiant attitude to retain the illegalities and not restore the despite orders passed by GCZMA, NGT and the Hon'ble High court leaves no scope for indulgence or equitable reliefs to the Appellant.
6. The impugned order directs the payment of environmental compensation. The Appellant is not entitled for a stay of such directions to pay the environmental compensation. No irreparable loss of



*Prachi*

injury will be caused to the Appellant if the stay as prayed is refused.



7. In the unlikely event that the Appellant succeeds in the present Appeal the money given to the GCZMA can be returned back to the Appellant. In such circumstances there is no irreparable loss or injury or which cannot be compensated in terms of money and therefore on this ground also this Hon'ble Court may please decline to grant any stay of the Impugned Order.
8. Alternatively, the Appellant can be put to terms of depositing substantial money with State Government or the GCZMA. The Appellant is a Builder and Developer who has carried out vast construction of premium projects and clearly ought to have the money and solvency to deposit the money.
9. The Respondent denies that the Applicant has a very good case to succeed on merits or that balance of convenience is entirely in favor of the Applicant. The Respondent denies that irreparable loss would be caused to the Applicant if the interim relief is not granted.
10. Respondent no. 2 denies all and singular the contents of the Application for Stay which are inconsistent or contrary to the contents of this Reply and the Reply to the Main Appeal. Nothing not

*(Signature)* avital

specifically denied may be treated to be an admission for mere want of specific traverse.

11. In the light of what is stated above and in light of what is stated in the Reply to the Main Appeal the Appellant is not entitled for grant of any interim relief or protection from this Hon'ble Court and this Application is liable to be dismissed with costs.

Mapusa, April 08, 2025

*M. P. P. P. P.*  
Respondent No. 2



**AFFIDAVIT**

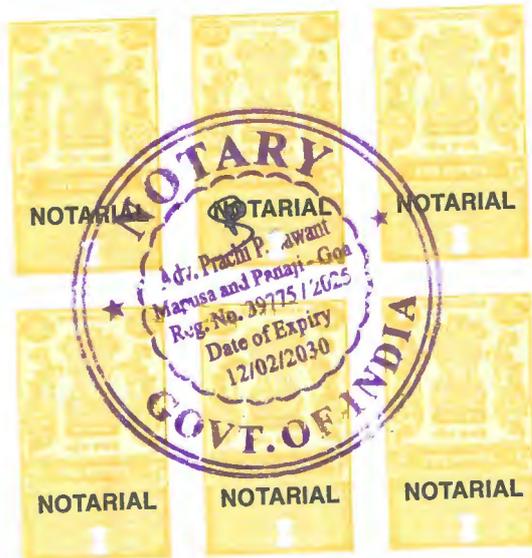
I, Mohinder Kaur Paintal, wife of Late Mr. Lakhinder Singh Paintal, aged 85 years, residing at H.No. 199/2/B1 – B2, Fernandes Vaddo, Siolim, Bardez, Goa 403517 do hereby on solemn affirmation state that what is stated by me in Paragraphs 1, 2, 3(p), 4, 5, 6, 7, 8, 9(p) and 10 is true to my knowledge and documents which I have accessed and what is stated by me in Paragraphs 3(p) and 9(p) are legal submissions which I believe to be true.



Solemnly affirmed as aforesaid

at Mapusa, Goa on this 8<sup>th</sup> day of April 2025

*Mohinder Kaur Paintal*  
Deponent



Solemnly affirmed before me by  
Shri/Smt. *Mohinder Kaur Paintal*  
who is identified to me by *Adhar Card*  
Shri/Smt. *727159189833*  
who is personally known to me  
this *8<sup>th</sup>* day of *April 2025*

*Prachi P. Sawant*  
**PRACHI P. SAWANT**  
ADVOCATE & NOTARY  
MAPUSA AND PANAJI - GOA  
(GOVT. OF INDIA)  
REG. NO. 39775

Ser. no. 22

*identified by Adhar Card*