

BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE
ORIGINAL APPLICATION NO. 37 OF 2023 (WZ)



IN THE MATTER OF:

SUSHANT SUBHASH MORE

... APPLICANT

VERSUS

M/S. HOTEL SAHYADRI PUSPA & OTHERS

...RESPONDENTS

REPLY TO THE COMMITTEE REPORT ON BEHALF OF THE RESPONDENT
NO. 21 - MR. FARROKH NARIMAN COOPER

1. On 15.03.2023, the Applicant filed the Original Application bearing No. 37/2023 (“**the said application**”) under the Section 14 & 15 of the National Green Tribunal Act, 2010 (“**NGT Act, 2010**”) before this Hon’ble National Green Tribunal, West Zonal Bench, Pune (“**this Hon’ble Tribunal**”) alleging violation of Environment (Protection) Act, 1984 and related environment laws on Kaas Plateau, Satara by 100 private respondents (mainly who are commercial establishments i.e. hotels, restaurants etc.).
2. In the said application I have been included as one of the respondents (Respondent No. 21) along with 99 other private respondents.
3. That I have filed my affidavit in reply to the said application on 28.09.2023 wherein I have countered all the allegations being baseless, as the thrust of the said application is on the alleged contravention made by the commercial establishments i.e. hotel,



restaurant and resorts relating to environment laws, notifications, guidelines issued on the subject matter and falling under 'Eco Sensitive Zone' whereas my construction which is being in question is that of a house/residential premises which is used exclusively for residential purposes and not falling under eco sensitive zone. No commercial activity or business is being carried out from the house. The gist of submissions made in affidavit in reply reads as follows:

- a. I have been unnecessarily dragged into the present proceeding and made party to this present application as the construction of house in question is a residential premises which is exclusively used for residential purposes. Neither any commercial activity or business was carried out on the said residential premises, nor was any environmental damage caused by this Respondent and in fact no such allegation is made against me.
- b. The only allegation levelled against this Respondent in the said application is in respect to alleged non-obtaining of the requisite permission for construction under the provisions of Maharashtra Revenue and Town Planning Act, 1966 ("MRTP Act"). The said allegation is made based on a few notices sent from the office of the Tehsildar Satara to this Respondent alleging that the said construction has been carried out without obtaining the requisite permissions. The gist of submission is as under:
- (i) At the outset, it is submitted that NGT is empowered to regulate violations of environment laws which are specifically stipulated in Schedule I of the National Green Tribunal Act, 2010 ("Act"). In this backdrop, the aforesaid dispute of non-obtaining requisite permission before construction is that of



a land use and not of any violation of environment law and therefore NGT lacks jurisdiction to adjudicate on matters of land use as it is outside the purview of the same. Therefore, at the outset, the aforesaid application is not maintainable before NGT in so far this Respondent is concerned.

- (ii) Even otherwise, there is no allegation of any violation of environmental laws against this Respondent and therefore the proceedings before NGT is not maintainable.
- (iii) Even otherwise, as far as construction of this Respondent is concerned the same has been made on Plot of land situated at GAT No. 284, Anawale Village, Taluka: Satara, District: Satara. The said village does not fall under "Ecologically Sensitive Area". Therefore, the present application is not maintainable.
- (iii) Even otherwise, the premises of this Respondent as constructed at Anawale Village is that of a house and since it is not a commercial property i.e. hotel, restaurant, bed-breakfast etc. this Respondent has unnecessarily been made party to the present proceedings.
- (iv) Even otherwise, in so far obtaining requisite permission for construction is concerned, this Respondent has duly taken the requisite permission from the Anawale Gram Panchayat for the purpose of construction of its residential premises as per the provisions of Maharashtra Land Revenue Code, 1966 ("MLRC") and accordingly, the said residential premises has



duly been recorded in the land records of the Anawale Gram Panchayat and paid local taxes to them and continues to do so.

- (v) Even otherwise, at the time of construction of the said residential premises during the years 2011 to 2013, there were no statutory conditions contemplated under the provisions of MRTP Act, 1966 regarding obtaining requisite permission from the Planning Authority and the same has been made mandatory only from the date of issuance of the Notification i.e., 23.12.2021 issued by the Urban Development Department under the MRTP Act, 1966. Thus, this Respondent has not violated any provisions of the MRTP Act, 1966.

4. Subsequently, on 04.12.2023, the captioned matter was listed for hearing before this Hon'ble Tribunal and during the course of hearing, since the private respondents are large in number and each and every case would be difficult to scrutinize, therefore, to go into the details of the violations made and to submit their recommendations as to the disputed constructions deserves to be demolished and/or environmental damage compensation needs to be imposed, this Hon'ble Tribunal vide its order dated 04.12.2023 constituted a committee. The said committee comprises one member each from:
- a. The District Collector, Satara;
 - b. The Maharashtra State Pollution Control Board;
 - c. The Environment & Climate Change Department, State of Maharashtra;
 - d. The Deputy Conservator of Forest, Satara;
 - e. The Maharashtra State Road Development Corporation Limited.

5. Vide the order dated 04.12.2023, this Hon'ble Tribunal directed the Committee to submit a factual and action taken report as to whether there is a violation of Environmental Impact Assessment Notification, 2006; Water (Prevention and Control of Pollution) Act, 1974; Air (Prevention and Control of Pollution) Act, 1981; Maharashtra Regional & Town Planning Act, 1966; and Forest Conservation Act, within a period of two months from the date of uploading order dated 04.12.2023. This Hon'ble Tribunal appointed the District Collector, Satara as a nodal agency for coordination and logistic support.
6. In compliance with the above said directions, a committee was constituted and submitted its action taken report ("**the said report/ Committee Report**") during subsequent hearing dated 05.03.2024. In the said report the Committee has made following observations in respect to contravention of environment laws and contravention of MRTP Act. The gist of the said observations and conclusions, in so far as this Respondent is concerned is as under:

S. No.	Acts/ Notifications	Stipulated Conditions to comply	Findings/observations of Committee's Report & it's conclusions and suggestions with respect to the Respondent No. 21	Accepted or Denied by the Respondent

1.	Environmental Impact Assessment Notification (EIA) dated 14.09.2006	As per EIA Notification dated 14.09.2006, a prior Environmental Clearance (EC) is necessary from the concerned authority in case where built-up area of Building or construction project exceeds 20,000 sq. meter.	Land Records Department carried out measurements of 100 objected structures which were verified by the Committee, and it is found that none of the objected structure is having built up area more than 20,000 sq.mtr. Basis this, it is observed that prior EC is not required. Annexure 3 to the report provides for a chart of measurement which shows that this Respondent has built-up area 520 Sq. meter only. Since there is no violation of this notification, Committee has no suggestions to make.	Accepted
2.	Water (Prevention and Control of Pollution) Act, 1974 [Water Act, 1974] and Air (Prevention and Control of	As per provisions of the Water Act 1974 and Air Act 1981, an establishment is required to take the permission/consent from the State Board [Maharashtra Pollution Control Board	The Committee segregated 100 establishments in 3 types: - 34 establishments comes under consent regime of MPCB. (listed in annexure-4 to report)	Accepted

	<p>Pollution) Act, 1981 [Air Act, 1981].</p>	<p>("MPCB"), in the present case], before operating.</p>	<p>- 11 establishments are residential plus home stay types which do not require consent from MPCB (listed in annexure-5 to report)</p> <p>- 55 establishments (including the residential property of this Respondent) are either private, residential property, private farmhouse or open plots and therefore, do not come under the consent regime of MPCB. (listed in annexure 6 to the report).</p> <p>Since for this Respondent consent to establish and operate is not required, no suggestion or action against this Respondent is suggested.</p>	
--	--	--	--	--



3.	Maharashtra Regional and Town Planning Act, 1966 (MRTP Act, 1966)	During the relevant time, when this Respondent constructed a residential premises, Section 42(2) of the MRTP Act provided that no permission is required to be taken for the use of agricultural land for residential purposes. The said amendment is published vide Circular No. NP1006/Pr.Kr.174/L-5 dated 22.05.2007 issued by the Government of Maharashtra, Revenue and Forest Department. Although by virtue of this amendment no permission was to be taken to construct a house on the agricultural land, this Respondent made an application with Anawale Grampanchayat for the same along with the plan of the house.	In terms of Notification dated 08.01.2018 (which declares the Regional Plan) read with Section 44, 45 of MRTP Act, 1966, all constructions/structures fall in Buffer Zone and not in Core Zone. As per Notification dated 23.12.2021, (which framed the regulations for Conservation Zone in Satara Region) , the construction is conditionally permissible in the Buffer Zone. The Committee has reached to conclusion that if the private respondents do not apply for regularization of their structures, the said structures will have to be demolished under the MRTP Act by the planning authority.	Denied The conclusion reached by the Committee is not accepted as the facts of this Respondent's case has not been issue has not been considered. Detailed submission will follow.
4.	Forest Conservation Act, 1980	The Forest Conservation Act, 1980 is only applicable where any of the	The Deputy Conservator has submitted its report (annexure 10 to the	Accepted

		structure/house/building/ hotel/farmhouse is situated in forest area.	report) to the Collector of Satara which revealed that none of the objected structures is situated in Forest and therefore has not violated the Forest Conservation Act 1980. The Committee has concluded that no action needs to be taken.	
--	--	---	--	--

7. On the bare perusal of the Committee Report, it is amply clear that there is no contravention of any of environment law by this Respondent i.e. EIA Notification dated 14.09.2006, Water Act 1974, Air Act 1981, and Forest Conservation Act, 1980, as has been alleged by the Applicant. Therefore, by virtue of the Committee Report, the captioned proceedings deserved to be set aside in so far this Respondent is concerned.
8. Reference is made to the operative portion of the conclusion/suggestion of the above said report of committee. Relevant extract of the same reads as under:

3.0 Committees Conclusion & Suggestions:

a) ELA Notification - 2006: Since, prior Environmental Clearance is not necessary. There is no violation of this Notification, hence Committee has no suggestion to make in this regard.

b) Water (Prevention and Control of Pollution) Act of 1974 and the Air (Prevention and Control of Pollution) Act of 1981: As regards those

Establishments for whom, the Consent to Establish and Consent to Operate was necessary, MPCB shall take action against them. Environmental Compensation can be recovered from them.

c) Violation of the Maharashtra Regional and Town Planning Act, 1966:

If the private respondents do not apply for regularization of their structures, the said structures will have to be demolished under the MRTP Act, 1966 for violation of the provisions of the said Act by the Planning Authority.

d) Forest Conservation Act, 1980: Since there is no violation of the Forest Conservation Act, no action needs to be taken.

9. It can be seen from the above that the Committee has affirmed the view or stand taken by this Respondent in the reply in affidavit filed before this Hon'ble Tribunal. By a conclusive reading of the affidavit in reply and the Committee Report, it is deduced as under:

- a. The Respondent has not violated any of the conditions as stipulated under the provisions of the Environmental Laws such as EIA Notification dated 14.09.2006, Water Act 1974, Air Act 1981, and Forest Conservation Act, 1980 which caused damage and detrimental impact on the environment.
- b. The Respondent has been unnecessarily dragged into the present proceeding as neither any environmental damages was caused by the Respondent nor any commercial or business activity was carried out by this Respondent which can suggest otherwise.



A. THE REPORT FURNISHED BY THE COMMITTEE IS NOT TO BE ACCEPTED TO THE EXTENT ITS CONCLUSION IN RESPECT TO VIOLATION OF THE MAHARASHTRA REGIONAL AND TOWN PLANNING ACT, 1966.

10. It is submitted that the Committee in the clause (c) of para 3 of the report, under the head "Observations & Findings" has categorically observed that none of the objected structures have obtained prior permission of the Planning Authority to carry out construction as required under Section 44, 45 of MRTP Act, 1966 and basis this observation the Committee in the Para 3.0 (c) of the report under the head "Committee's Conclusion and Suggestions" has concluded that if the private respondents do not apply for regularization of their structures, the said structures will have to be demolished under the MRTP Act, 1966 for violation of the provisions of the said Act by the Planning Authority.
11. In this regard, it is submitted that the observation made by the Committee Report in the clause (c) of para 3 is not acceptable by this Respondent as the same has been made without any verification of legal provisions and facts in so far this Respondent is concerned. It is submitted that while reaching to the conclusion of the violation of MRTP Act, 1966 the Committee has neither verified the factual or legal aspects in respect to construction of this Respondent is concerned nor granted any opportunity of representation or hearing to this Respondent. Detailed submission in respect to the construction being legal is made in paragraphs 21 to 29 of this reply which clearly shows that this Respondent has not contravened the provisions of MRTP Act, 1966 as observed in the Committee report.

12. It is a settled law that no adverse decision can be taken without following the principles of natural justice. 'Audi alteram partem', is the basic principle of natural justice which provides that no one should be condemned unheard. It is imperative to follow the principles of natural justice to prevent miscarriage of justice. Similar view has been taken by the Hon'ble Supreme Court in the case of *Uma Nath Pandey V. State of U.P.* 2009 (237) ELT 241 (S.C).

13. In view of the above, it is amply clear that non-providing the opportunity to file the representation and personal hearing granted to the Respondent is an act miscarriage of justice and therefore the said observation and conclusion based on the said observation is bad in law and not to be rejected on this reason, alone.

B. THIS HON'BLE TRIBUNAL LACKS THE JURISDICTION TO DECIDE THE ALLEGED VIOLATION OF MRTP ACT, 1966/MLRC.

14. Without prejudice to the aforesaid and in any event, it is submitted that the present Original Application has been filed by the Applicant under Section 14 and 15 of the NGT Act, 2010 challenging breach of Environment (Protection) Act, 1986, the Water Act 1974, the Air Act, 1981, Solid Waste Management Rules, 2016 as well as the MRTP Act, 1966 and the MLRC, 1966.

15. It is amply clear from the Committee Report that there is no contravention of any environmental laws in so far as this Respondent is concerned. In so far observation in respect to contravention of MRTP Act is concerned i.e. non-obtaining the requisite



permission for construction of house under the provisions of MLRC, 1966, detailed submission is made in para 20 to para 28 of this present reply.

16. In this background, it is submitted that Section 14 of the NGT Act, 2010 provides that the NGT/this Hon'ble Tribunal shall have jurisdiction over all civil cases where a substantial question relating to environment is involved and such question arises out of the implementation of the enactments specified in Schedule-I of the NGT Act, 2010. For the purpose of better understanding and clarity, the title of enactments of Schedule-I of NGT Act, 2010 are as follows:

- i. The Water (Prevention and Control of Pollution) Act, 1974,
- ii. The Water (Prevention and Control of Pollution) Cess Act, 1977,
- iii. The Forest (Conservation) Act, 1980,
- iv. The Air (Prevention and Control of Pollution) Act, 1981,
- v. The Environment (Protection) Act, 1986,
- vi. The Public Liability Insurance Act, 1991,
- vii. The Biological Diversity Act, 2002.

17. As can be seen from the above it is clear that this Hon'ble Tribunal shall have jurisdiction over only those cases which raise a substantial question pertaining to the environment law arising out of the above-mentioned enactments as specified in Schedule-I of the NGT Act, 2010. It is noteworthy that neither the MRTP Act, 1966 nor the MLRC, 1966 comes under the purview of Schedule I of the NGT Act, 2010. Thus, this Hon'ble Tribunal lacks the jurisdiction to decide the issue pertaining to the MRTP Act, 1966/MLRC as those laws govern use of land. A similar view has been



taken by the Delhi Bench of NGT in **Nigam Priyae Saroop V/s. State of Jammu Kashmir and Ors.** In Original Application No. 132 of 2016.

18. In support of this submission, reliance is also placed on the decision of the Hon'ble NGT, Principal Bench, New Delhi in the case of **Bachhu Singh vs. State of Haryana & Ors.** Original Application No. 813 of 2017 wherein the Hon'ble Tribunal has categorically refused to exercise its jurisdiction under Section 14 of the NGT Act, 2010 in respect of an issue raised in Punjab Land Preservation Act, 1900 by stating the Punjab Land Preservation Act, 1900 does not fall within the Schedule I of NGT Act, 2010.

19. A similar view has been taken by this Hon'ble Tribunal in the identical case of **Sanjay Bhegade & Ors. V/s. State of Maharashtra & Ors.** In Original Application No. 33/2018 (WZ) wherein while disposing of the application this Hon'ble Tribunal held that there is no substance in the proceedings as the unauthorized constructions of the private Respondents will be governed under local laws. Relevant extract of the said decision reads as under:

16. Since the respondent No.2/PMRDA has clearly stated in their affidavit that notices have been issued under Section 53 Sub-Clause (1) of the MRTP Act 1966 to 37 unauthorized constructions and that the same is under consideration and they will proceed against them in accordance with law.

17. We find after having heard the arguments of learned Counsel for the respondent No.2/PMRDA as well as the other respondents, who have appeared today, that the legal position is that if any construction is there in ESA (Economic Sensitive Area), which is more than 20,000 sq. mtrs., then only the question of EC would arise and not below that and in the case in

hand, the constructions, which are said to have been constructed by the Private Respondents, are much below that and the same would be governed by the local laws. Under the said laws, notices have already been issued by the respondent No.2/PMRDA to individual owners and that the process is going on.

18. We do not find any substance in the present application, therefore, the same needs to be disposed of and is accordingly disposed of.

20. In view of the above, it is amply clear that this Hon'ble Tribunal does not have the jurisdiction to adjudicate any dispute pertaining to the violation of MRTP Act, 1966. In view thereof, the present application is to be disposed of being non maintainable in so far disputed construction of Respondent No. 21 is concerned.

C. THE RESPONDENT HAS OBTAINED THE REQUISITES PERMISSION FROM THE AUTHORITY UNDER THE PROVISIONS OF MLRC, 1966, THUS, THE RESPONDENT HAS NOT VIOLATED ANY OF THE CONDITIONS AS STIPULATED UNDER THE PROVISIONS OF MRTP ACT, 1966.

21. Without prejudice to the submission of this Respondent that the present proceeding is not sustainable before this Hon'ble Tribunal, it is submitted that the observation made in clause (c) of para 3 of the Committee Report that none of the objected structures have obtained prior permission of the Planning Authority to carry out construction as required under Section 44, 45 of MRTP Act, is not acceptable in so far this Respondent is concerned. The Committee Report also stated that in terms of Notification dated 23.12.2021 the State Government has framed regulations for Conservation Zone in Satara region. The location of all objected structures falls in the Buffer Zone and not in the Core Zone and the construction in the Buffer Zone is conditionally permissible in

the Buffer Zone. Basis this observation the Committee has concluded that if the private respondents do not apply for regularization of their structures, the said structures have to be demolished under the MRTP Act for violation of the said Act by the Planning Authority.

22. The said observation that this Respondent has not obtained permission before construction is incorrect inasmuch as the same has been made without going through the factual and legal background of the construction of the residential premises of this Respondent. Accordingly, this Respondent is making below mentioned submission to substantiate that there is no contravention of MRTP Act and the Committee observation to this extent is incorrect.

23. It is submitted that the Respondent has constructed a house over a piece of agricultural land measuring 3,31,100 sq. feet, in the Anawale village of Satara district during the years 2011 to 2013. Admittedly, the said house has only been used for residential purposes.

24. Section 42 of the MLRC provides that the agricultural land can be used for non-agricultural purposes with the permission of the Collector. The said Section was amended in the year 2007 by way of insertion of Section 42(2), which provided that no permission is required to be taken for the use of agricultural land for residential purposes. The said amendment is published vide Circular No. NP1006/Pr.Kr.174/L-5 dated 22.05.2007 issued by the Government of Maharashtra, Revenue and Forest Department. By virtue of this amendment no permission is to be taken to construct a house on the agricultural land.

RY
IMBE
ARA
(M.S.)
092
INT

25. In the year 2010 this Respondent has decided to construct the said residential premises/house on the said agricultural land and after considering the aforesaid amendment, this Respondent duly approached the Anavale Village Gram panchayat with the plans of construction of a house. In this regard, an application for the same along with the plan for the house was submitted to the Gram panchayat. On 03.02.2011 the Gram panchayat granted permission for construction of the house.
26. The house was built as per the approved plan. Upon completion of the said construction of house, entry of the same was made in the Form No. 8A of Anawale village records which specifically mentioned the area of construction and based on the said quantum of construction the assessment of the said property was made for the payment of local taxes which clearly established that the said house is used exclusively for residential purposes, and no commercial activity or business was being carried out from the said house.
27. Since the year 2015, a couple of notices have been issued from time to time by the Tehsildar, Satara, alleging that the said construction has been carried out without obtaining the requisite permissions from the concerned authority. In response to the said notices, this Respondent has duly replied to each of the said notices and disputed the allegations and submitted the documentary evidence to show its bona-fides or genuineness for obtaining the permission by this Respondent from the Anawale Gram panchayat.
28. Further, it is noteworthy that at the time of construction of the said residential premises by the Respondent, there were no statutory conditions contemplated under the

IR)
LIMBE
TARA
(M.S
9092

FIN

provisions of MRTP Act, 1966 regarding the obtaining of requisite permission from the Planning Authority. The same has been mandated and imposed only from the date of issuance of Notification i.e., 23.12.2021 issued by the Urban Development Department under the MRTP Act, 1966. In other words, it can be said that as the construction of the said premises has already been completed much prior to the issuance of said Notification dated 23.12.2021, therefore, the Notification dated 23.12.2021 is not applicable to this Respondent.

29. In view of the above, it is amply clear that the Respondent has not contravened/violated any conditions as stipulated under the provisions of MRTP Act, 1966.

D. THE PRESENT LITIGATION IS VEXATIOUS, FRIVOLOUS AND SPURIOUS AND HAVE BEEN FILED TO HARASS THIS RESPONDENT

30. It is germane to note that this Respondent since the beginning of this proceeding has constantly made a submission that the present application is not maintainable as there is no allegation of any environment law contravention and the issue of alleged contravention of MRTP Act/MLRC is beyond the jurisdiction of this Hon'ble Tribunal and therefore this Respondent has unnecessarily been dragged in the present proceeding.

31. As it is clear from the report of the Committee that there is no contravention of any environment law for which the proceedings can be continued against this Respondent, it is submitted that the entire proceeding is vexatious and wrong.

32. In this respect reliance is placed on the provision of Section 18 (2) of the NGT Act 2010 which has expressly conferred the power to NGT/this Hon'ble Tribunal for granting



of relief or compensation to any person who is aggrieved by the application of Section 14 and 15 of the NGT Act, 2010. Relevant extract of Section 18 reads as under:

33. Since it is clearly established from the report of the Committee that the present Respondent has been unnecessarily dragged into the present proceeding therefore, the Respondent is entitled for relief, damages, and compensation under provisions of NGT Act, 2010 and request this Hon'ble Tribunal to grant such compensation to this Respondent to set an example and to avoid anyone approaching this Hon'ble Tribunal with frivolous proceedings.
34. Further, it is submitted that the instant application is devoid of not merit but also downright motivated to achieve personal mileage targeted over the Respondent based on false grounds. The Applicant has pursued this litigation only to harass the Respondent and by doing so, has transgressed the jurisdiction of this Hon'ble Tribunal. Not only are the averments made by him against the Respondent blatantly false but also are unsubstantiated and unproved. Therefore, the present application shall be dismissed by this Hon'ble Tribunal and exemplary costs may be imposed on the Applicant for having filed a vexatious application and misusing valuable judicial and executive processes.
35. It is settled position in law that Court shall not entertain the frivolous petition unless it shall be verifying the nature of correctness of averments made by the Petitioner. Reliance is placed on the decision of Hon'ble Supreme Court in the case of **State of Uttaranchal vs. Balwant Singh Chauhal & Ors.** (2010) 3 SCC 402 wherein the Hon'ble Supreme Court held that before entertaining any petition, the Courts must satisfy themselves about the credentials of the applicant and prima facie the correctness



NOT
Adv.
A. A. W
AREA S
DISTR
Reg. N
GOVT. O

NOTED & REGISTERED
AT SR. No. 1017/2024
DATE - 02/07/2024

of the nature of information given by him. It was also observed that mischievous petitions which merely indulge in reckless allegations filed for oblique motives must not be entertained.

36. In view of the above, this Hon'ble Tribunal may be pleased to award or grant the relief, damages, and compensation to this Respondent as it may deem fit.

37. In view of the detailed submission, it is humbly prayed that the present application may be disposed of being non-maintainable as far as this Respondent is concerned and this Hon'ble Tribunal be pleased to grant compensation to this Respondent for dragging him in the frivolous proceedings by the Applicant.

Farrokh N. Cooper
Respondent No. 21

Kirti
Advocate for Respondent No. 21



VERIFICATION

I, Farrokh Nariman Cooper, Indian Inhabitant, aged 78 years, the Respondent No. 21 having office at Nariman House, Plot No. M-60-1, Additional M.I.D.C., Satara 415 004 do hereby state on solemn affirmation that whatever is stated in paragraphs 1 to 23 true and correct to the best of my knowledge, information and belief and whatever is stated in the remaining paragraphs is based on the information which I believe to be true.

Solemnly affirmed at Satara)

Farrokh N. Cooper
Before me,

Dated this 2nd day of July 2024)

Kirti
Advocate for the Respondent No. 21

BEFORE ME
Ashutosh A. Walimbe
ADV. ASHUTOSH A. WALIMBE
NOTARY GOVT. OF INDIA
REG. NO. 9092 AREA SATARA DIST