

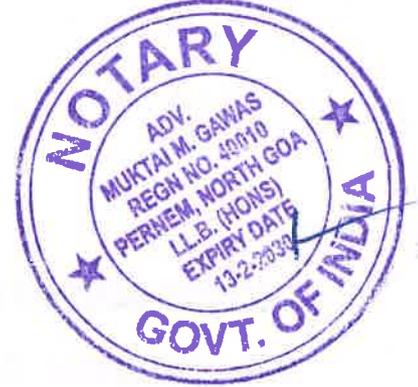
**BEFORE THE NATIONAL GREEN TRIBUNAL, WESTERN
ZONE**

BENCH, PUNE AT PUNE

I.A . No. 160/2025

IN

APPEAL NO. 118/2025



IN THE MATTER OF:-

MR. KRISHNA RAGHUVVEER
PEDNEKAR & Ors

.... APPELLANT

Versus

GOA COASTAL ZONE MANAGEMENT
AUTHORITY & ANR.

....RESPONDENTS

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FILED THROUGH


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PLACE: Pune

DATE: 17/9/25

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

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GOA COASTAL ZONE MANAGEMENT

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....RESPONDENTS

**REPLY TO APPLICATION ON BEHALF OF RESPONDENT NO. 5
FOR STAY, I.A 160/2025 FILED BY THE APPELLANT IN
APPEAL NO. 118/2025.**

MOST RESPECTFULLY SHOWETH:

I, Shri. Anil Prabhakar Naik, S/o late Prabhakar Shambhoo Naik,
R/o - 64/F, Parel Village, Parel, Mumbai -400012, do hereby
solemnly affirm and state on oath as under:-

1. That I am the Respondent No. 5, and such I am well
conversant with the facts and circumstances of the case and

Anil Naik



in that capacity I am duly competent to swear to the present affidavit.

2. That after carefully going through the Appeal filed on behalf of the Appellant, I am submitting the present Reply for kind consideration of this Hon'ble Tribunal.

3. I state that the Appellant has filed the present Appeal challenging the demolition direction bearing reference No. GCZMA/N/Ille-Compl/22-23/35/PartXIV/3965, dated 28/02/2025 passed by the Respondent No. 1 Goa Costal Zone Management Authority (GCZMA), directing demolition of illegal structure.

4. At the outset, the contents, allegations and averments made in Stay Application are denied ad seriatim as though traversed, save and except as rare matters of record and/or as are specifically admitted herein. It is stated the contents of the Application are baseless, incorrect and liable to be rejected at the threshold.

5. I state that the contentions raised in the Application are not true and correct and the same are denied by the Respondent. There is no justifiable reason mentioned by the Appellant for filing an Appeal. The conjectures made by the


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Applicant in the present I.A. 160/2025 are without any sufficient cause or evidence.

PARA -WISE REPLY:

6. It is stated that the allegations and the averments of the Appellant/Applicant in Para -1 of the Stay Application bearing I.A 160/2025 is false, incorrect and baseless. It is stated that the Appellant/Applicant is seeking to deliberately mislead this Hon'ble Tribunal with grossly false assertions.
7. The contents of the Para 2 are a matter of record and need no reply.
8. The Contents of Para 3 of the Application are misleading facts while suppressing the material facts on record in order to prejudice this Hon'ble Tribunal against the Respondent No. 5. That the contents of Para -3 are vehemently denied. It is denied that the said structure existing in the said property was constructed prior to 1991, i.e. prior to the CRZ Notification coming into force. It is submitted that the said illegal structure is a newly constructed structure without any permission from the authorities that fall within the CRZ, Sy. No. 116/35, which is NO DEVELOPMENT ZONE,

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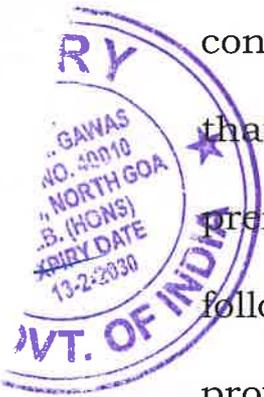


and the said illegal structure is used for commercial activities by the Appellant herein.

9. The Contents of Para 4 of the Application are misleading facts while suppressing the material facts on record in order to prejudice this Hon'ble Tribunal against the Respondent No. 5. That the contents of Para -4 are vehemently denied. It is denied that direction passed by the Respondent No.1 is bad in law. That the Appellant has done altogether 5 new construction which falls under NO DEVELOPMENT ZONE, that is why the Hon'ble High Court directed to seal the premises, and the order is passed against him after following due process of law, and the Applicant failed to prove his case on merit and rightful legal defence before the GCZMA, now making a contradictory stand before this Hon'ble Tribunal.

10. The Contents of Para 5 of the Application are misleading facts while suppressing the material facts on record in order to prejudice this Hon'ble Tribunal against the Respondent No. 5. That the contents of Para -5 are vehemently denied.

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11. The Contents of Para 6 of the Application is misleading facts while suppressing the material facts on record in order to prejudice this Hon'ble Tribunal against the Respondent No. 5. That the contents of Para -6 are vehemently denied. It is submitted that the Applicant was duly represented before GCZMA, and after following the due process of law the demolition order was passed by GGCZMA.

12. The Contents of Para 7-8 of the Application are misleading facts while suppressing the material facts on record in order to prejudice this Hon'ble Tribunal against the Respondent No. 5. That the contents of Para -7-8 are vehemently denied. It is submitted that the Applicant has failed to make even a prima facie case against the illegal structure. Therefore, the balance of convenience lies in favor of the answering respondent, especially when the Applicant has brought nothing on record to point out any permission for illegal permission from authorities, and this Hon'ble Tribunal ought not to stay the impugned order. It is further submitted that the interim application are mala-fide, motivated and false.

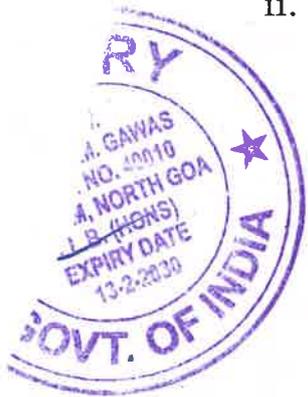
Apnaik



PRAYERS

It is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- i. Dismiss the present I.A 160/2025 with exemplary costs;
- ii. Pass such other or further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.



FILED THROUGH

Pratik

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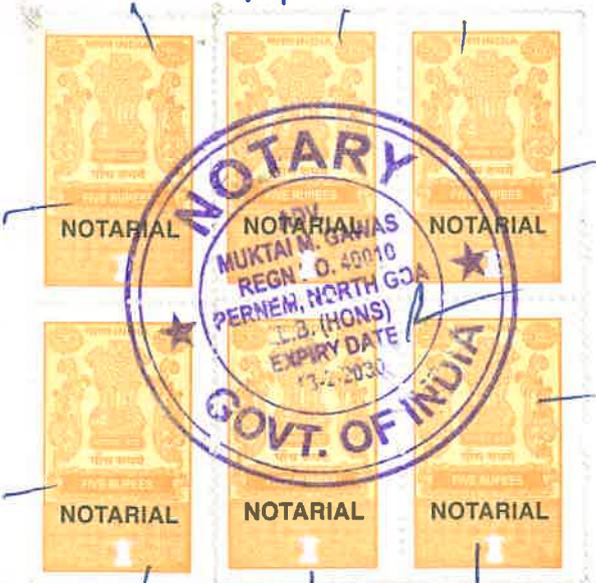
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Email:-ankurtnls.18@gmail.com

PLACE: Pune

DATE: 17/9/2025



Solemnly affirmed Before me by Anil Prabhakar Naik who has been Identified before me by Atkar card known to me personally
 Pernem on 17/9/25 Regn. No. 753/25

Anand
ADV. MUKTAI MANOHAR GAWAS
 NOTARY
 PERNEM, NORTH GOA
 GOA

