

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH AT NEW

DELHI

ORIGINAL APPLICATION NO. 820 OF 2022

IN THE MATTER OF:

NAVEEN KUMAR

...APPLICANT

VERSUS

UNION OF INDIA &amp; ORS.

...RESPONDENTS

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THROUGH

  
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PLACE-GURUGRAM

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REPLY ON BEHALF OF RESPONDENT NO.8 I.E. SHIVALIK HOSPITAL TO THE  
ADDITIONAL AFFIDAVIT FILED BY THE APPLICANT.

MOST RESPECTFULLY SHOWETH:

1. At the outset, the Respondent herein denies each and every statement, submissions and contentions set forth in the Additional Affidavit to the extent the same are contrary to and/or inconsistent with the true and complete facts of the case and/or the submissions made on behalf of the Respondent herein in the present Reply. The Respondent herein further humbly submits that the averments and contentions, as stated in the Additional Affidavit under reply, may not be taken to be deemed to have been admitted by the Respondent herein, save and except what are expressly and specifically admitted and the rest may be read as travesty of facts.

2. PRELIMINARY SUBMISSIONS:

1. That at the very outset it is most relevant and important to bring to the notice of this Hon'ble Tribunal that the present Original Application has

been filed by the Applicant Shri. Naveen Kumar out of malafide and to wreak vengeance as a close friend and relative of the Applicant i.e. Mr. TB Singh (Ex Principal Scientific Officer, Himachal Pradesh Pollution Control Board), was gotten arrested red handedly accepting a bribe of Rs. 3,70,000/- from the answering Respondent for granting Consents which the answering Respondent Hospital was even otherwise entitled to. The Applicant i.e. Shri. Naveen Kumar is a resident of Meerut (Uttar Pradesh) and Mr. TB Singh also belongs to UP having his house in Dehradun.

2. Despite having applied for Consent to Establish as well as Consent to Operate by way of an application complete in all respect along with requisite fees in the year 2018, the said Mr. TB Singh who was Principal Scientific Officer and was in charge of Una from the beginning started harassing the Respondent demanding money despite the fact that the hospital was fully compliant. After being fed up the answering Respondent approached the State Vigilance & Anti-Corruption Bureau Himachal Pradesh and with their help a trap was laid and Mr. TB Singh was caught red handed accepting a bribe of Rs.3,70,000/- and was taken into custody.
3. It is submitted that it is under these circumstances that the said Mr. TB Singh has gotten this Original Application filed through his relative Shri. Naveen Kumar just to harass the answering Respondent herein who in accordance with law is running a very small nursing home of 10 beds, wherein occupancy is hardly of 2-3 beds daily. That the Respondent herein has also recently got to know that the then Principal Scientific Officer Mr. TB Singh purposely made sure that no communication in form of notices and letters issued by the Respondent Board, reached the Respondent herein.

3. PARA-VISE REPLY TO THE CONTENTS OF THE ADDITIONAL AFFIDAVIT:

1. That the contents of the corresponding paragraph need no reply from the answering Respondent No.8. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
2. That in response to the contents of the corresponding paragraph it is submitted that the Hon'ble National Green Tribunal vide order dated 18.11.2022 issued notice to the Respondents requiring them to file their respective replies. It is submitted that in furtherance of the order dated 18.11.2022 the registry of this Hon'ble Tribunal issued notice dated 25.11.2022 to the Respondent No.8 herein and a reply dated 21.01.2023 was filed by the Respondent herein in compliance thereof. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
3. That the contents of the corresponding paragraph are wrong and hence denied. The additional facts and circumstances stated by the Applicant in its additional affidavit are denied in toto. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
  - a. That in response to the contents of the corresponding paragraph it is submitted that the Respondent No.8 herein was earlier running a 5 bedded hospital at a different location other than the location of the hospital which is the subject matter of this Original Application. It is necessary to mention herein that the notice dated 21.06.2004 as mentioned by the Applicant was issued by the concerned Authority for the earlier 5 bedded hospital situated near Old Bus Stand, Una. The

- contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- b. That in response to the contents of the corresponding paragraph it is submitted that the Respondent No.8 herein was earlier running a 5 bedded hospital at a different location other than the location of the hospital which is the subject matter of this Original Application. It is necessary to mention herein that the notice dated 21.06.2004 as mentioned by the Applicant was issued by the concerned Authority for the earlier 5 bedded hospital situated near Old Bus Stand, Una. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- c. That the contents of the corresponding paragraph are true to the extent that are admitted herein. It is reiterated that the Respondent No.8 herein was earlier running a 5 bedded hospital near Old Bus Stand, Una. The Authorization Letter dated 06.11.2006 as stated by the Applicant, throws a light on the fact that even prior to 2013 (i.e. before shifting the hospital to location of the hospital which is the subject matter of this Original Application) the Respondent No.8 herein was running the 5 bedded hospital situated near Old Bus Stand, Una only after obtaining due Authorization under the Biomedical Waste (Management and Handling Rules), 1998. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- d. That in response to the contents of the corresponding paragraph it is submitted that the Authorization dated 06.11.2006 issued by the concerned Authority for running the 5 bedded hospital near Old Bus

- Stand, Una was further renewed by the Competent Authority on 30.12.2008 and was valid upto 31.03.2011. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- e. That in response to the contents of the corresponding paragraph it is submitted that from year 2011 upto 2013, in the two storied building near Police Line, Jhalera, Una (that is the subject matter of the present Application) only a small makeshift laboratory/consultancy was set up by the Respondent No.08 initially whereas the rest of the premises was being solely used only for residential purpose. Hence, there was no bio medical waste generated and after the issuance of the notice dated 23.07.2011, the Respondent No.08 herein categorically informed the Respondent Board that there is no Biomedical waste being generated as the Hospital was yet to be set up and there was no operation all together. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- f. That in response to the contents of the corresponding paragraph it is submitted that the Respondent No.8 in the year 2011, decided to shift the hospital location from Old Bus Stand, Una to near Police Line, Jhalera, Una. It is necessary to mention herein that in the two storied building near Police Line, Jhalera, Una (that is the subject matter of the present Application) only a small makeshift laboratory/consultancy was set up by the Respondent No.08 initially whereas the rest of the premises was being solely used only for residential purpose upto the year 2013. Further, to initiate the process of setting up the 10 bedded hospital in the said premises, the Respondent No.8 submitted FORM-1 before the concerned authority

- for obtaining authorization under the Biomedical Waste (Management and Handling Rules), 1998. It is submitted that the Respondent No.8 wanted to have all the permissions before setting up the said 10 bedded hospital which indicates the intention of the Respondent No.8 to run the hospital as per law. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- g. That in response to the contents of the corresponding paragraph it is submitted that pursuant to the submission of FORM-1 by the Respondent No.8, the concerned Authority granted Authorization dated 31.12.2011 to the Respondent No.8 herein under the Biomedical Waste (Management and Handling Rules), 1998. It is reiterated that though the permission was obtained on 31.12.2011, yet the Respondent No.8 started the 10 bedded hospital only in the year 2013 after obtaining no objection certificate dated 07.06.2013 from the Office of the Gram Panchayat, District Una, Himachal Pradesh. It is submitted that though the permission was taken for a 10 bedded hospital, yet occupancy is hardly of 2-3 beds daily. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- h. That in response to the contents of the corresponding paragraph it is reiterated that from year 2011 upto 2013, in the two storeyed building near Police Line, Jhalera, Una (that is the subject matter of the present Application) only a small makeshift laboratory/consultancy was set up by the Respondent No.08 initially whereas the rest of the premises was being solely used only for residential purpose. Hence, there was no bio medical waste generated and after the issuance of the notice in the

year 2012, the Respondent No.08 herein categorically re-informed the Respondent Board that there is no Biomedical waste being generated as the Hospital was in the process of being set up and there was no operation all together. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.

- i. That in response to the contents of the corresponding paragraph it is submitted that no such notice was ever received by the Respondent No.08 herein. It is pertinent to mention herein that the Respondent Hospital has Consent to Establish as well as Consent to Operate and also Authorization under the Bio Medical Waste (Management) Rules, 2016 and is running the hospital in full compliance as per the prescribed norms. It is submitted that starting from the year 2014 till date, the Respondent Hospital has entered into Agreements with Bio Medical Waste Collection facilities for collection of Bio Medical Waste from the hospital and the same have been placed on record for the convenience of this Hon'ble Tribunal. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- j. That in response to the contents of the corresponding paragraph it is submitted that no such notice was ever received by the Respondent No.08 herein. It is pertinent to mention herein that the Respondent Hospital has Consent to Establish as well as Consent to Operate and also Authorization under the Bio Medical Waste (Management) Rules, 2016 and is running the hospital in full compliance as per the prescribed norms. It is submitted that starting from the year 2014 till date, the Respondent Hospital has entered into Agreements with Bio Medical Waste Collection facilities for collection of Bio Medical Waste

- from the hospital and the same have been placed on record for the convenience of this Hon'ble Tribunal. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- k. That in response to the contents of the corresponding paragraph it is submitted that upto the year 2013, the said premises i.e. two storeyed building was being solely used only for residential purpose. It is submitted that for the purpose of setting up a 10-bed hospital a No-objection was sought from the Office of Gram Panchayat, District Una, Himachal Pradesh and the same was granted to the Respondent herein on 07.06.2013. It is submitted that thereafter an application for renewal of authorization under the Biomedical Waste (Management and Handling Rules), 1998 was submitted by the Respondent Hospital herein and the same was granted on 21.03.2015. It is submitted that the authorization dated 21.03.2015 was valid upto 31.03.2017. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.
- l. That in response to the contents of the corresponding paragraph it is submitted that the Respondent No.8 herein did not receive any letter dated 27.07.2017 from the Board. That the Respondent herein also got to know that the then Principal Scientific Officer Mr. TB Singh purposely made sure that no communication in form of notices and letters issued by the Respondent Board, reached the Respondent herein. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.

- m. That in response to the contents of the corresponding paragraph it is submitted that as per the Biomedical Waste (Management and Handling Rules), 1998 the Health Care Facilities (HCF's) were required to obtain only authorization under the Biomedical Waste (Management and Handling Rules), 1998 and there was no requirement for obtaining Consent under the Water (Prevention and Control of Pollution) Act, 1974. However, the Ministry of Environment, Forest & Climate Change, Government of India in supersession of Bio-medical Waste (Management & Handling) Rules, 1998 vide notification dated 28.03.2016 revised and issued Bio-Medical Waste Management Rules, 2016. As per Rule 10 of these revised rules the Health Care Facilities (HCFs) were required to obtain Consent under the Water (Prevention and Control of Pollution) Act, 1974 in addition to Authorization from the State Pollution Control Board. That since the Ministry of Environment, Forest & Climate Change, Government of India in suppression of Bio-medical Waste (Management & Handling) Rules, 1998 vide notification dated 28.03.2016 revised and issued Bio-Medical Waste Management Rules, 2016 and as per Rule 10 of these revised rules the Health Care Facilities (HCFs) were required to obtain Consent under the Water (Prevention and Control of Pollution) Act, 1974 in addition to Authorization from the State Pollution Control Board, the Respondent herein submitted an Application for obtaining Consent to Establish and Consent to operate. It is submitted that the application submitted for obtaining the Consent to Establish as well as the Consent to Operate was complete in all respects and the requisite fees was also paid by the Respondent herein. It is submitted that there was no reply whatsoever by the State Pollution Control Board on the application for Consents submitted by the Respondent herein. That as

per the provisions of the Water (Prevention and Control of Pollution) Act, 1974, since there was no reply to the application for Consents, the Respondent herein was deemed to be operating with the consent of the State Board. Thus, legally speaking the hospital in question had deemed consent in view of Section 25(7) of the Water (Prevention & Control of Pollution) Act, 1974. That Section 25(7) of the Water (Prevention & Control of Pollution) Act, 1974 is reproduced herein for your ready reference:

*"25(7) The consent referred to in sub-section (1) shall, unless given or refused earlier, **be deemed to have been given unconditionally on the expiry of a period of four months of the making of an application in this behalf complete in all respects to the State Board.**"*

Despite having applied for Consent to Establish as well as Consent to Operate and Authorization under the Bio Medical Waste (Management) Rules, 2016 by way of an application complete in all respect along with requisite fees in the year 2018, there was no reply by the State Pollution Control Board accepting or rejecting or pointing out deficiencies in the application for Consents under Water (Prevention and Control of Pollution) Act, 1974 submitted by the Appellant herein. Thus, the Respondent herein was legally operating with deemed Consents as per Section 25(7) of the Water (Prevention & Control of Pollution) Act, 1974. That it is pertinent to mention herein that in the month of September 2019, the Respondent herein at the recommendation of the Mr. TB Singh who was at that time Principle Scientific Officer with the Respondent Board, installed a Sewage Treatment Plant of capacity 3 KLD in the premises. It is in the humble

submission of the answering Respondent herein that not only did Mr. TB Singh (Ex Principle Scientific Officer with the Respondent Board) advise to install Sewage Treatment Plant but also asked the Respondent herein to apply again for the Consents under the Water (Prevention and Control of Pollution) Act, 1974 online as there was no reply by Respondent Board on the previous Application submitted by the Respondent Board in 2018. That blindly following the advice of Mr. TB Singh, the Respondent herein re-submitted an application online for grant of Consents under the Water (Prevention and Control of Pollution) Act, 1974. It is submitted that along with the application made online, Mr. TB Singh also asked the Respondent herein to re-pay the fees from 2018 onwards. It is submitted that the Respondent herein paid an amount of Rs. 5000/- towards consent fees. It is pertinent to mention herein that even after re-applying for the consents under the Water (Prevention and Control of Pollution) Act, 1974 online, there was no reply whatsoever from the Respondent Pollution Control Board. It is submitted that on enquiring about the same from Mr. TB Singh (Ex Principle Scientific Officer with the Respondent Board), Mr. TB Singh demanded money in form of bribe from the Respondent herein for grant of Consents and also questioned the Respondent herein as to why the Sewage Treatment Plant was not installed from a favorite vendor of Mr. TB Singh and was rather bought and installed from some other place. That in light of the same the Respondent herein made a police complaint against Mr. TB Singh for demanding bribe for the release of Consent Certificates and an FIR being FIR No.04/2022 under Section 7 of Prevention of Corruption Act, 1988 was also registered against the then Chief Scientific Officer Mr. TB Singh by the State Vigilance & Anti-Corruption Bureau Himachal Pradesh and the said Mr.

TB Singh was caught red handed accepting Rs. 3,70,000/- and was arrested. It is submitted that the matter is still under investigation by the State Vigilance & Anti-Corruption Bureau Himachal Pradesh. It is submitted that the Consent to Operate under Water (Prevention and Control of Pollution) Act, 1974 pursuant to the second application submitted in 2021 was eventually granted to the Respondent Hospital on 16.08.2022 and is valid till 31.03.2027. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.

- n. That in response to the contents of the corresponding paragraph it is submitted that the Respondent herein submitted an application dated 19.08.2018 for renewal of Authorization under Biomedical Waste (Management) Rules, 2016. It is submitted that the application submitted by the Respondent herein for renewal of Authorization under Biomedical Waste (Management) Rules, 2016 was complete in all respects and the requisite fees was also paid by the Respondent herein. It is submitted that there was no reply whatsoever by the State Pollution Control Board on the application for renewal of authorization submitted by the Respondent herein. That as per Rule 10(3) of the Biomedical Waste (Management) Rules, 2016 since there was no reply to the application for renewal of authorization, the Respondent herein was deemed to be operating with the authorization of the State Board. Thus, legally speaking the hospital in question had deemed authorization in view of Rule 10(3) of the Biomedical Waste (Management) Rules, 2016. That Rule 10(3) of the Biomedical Waste (Management) Rules, 2016 is reproduced herein for your ready reference:

*"10(3) Every application for authorization shall be disposed of by the prescribed authority within a period of ninety days from the date of receipt of duly completed application along with such necessary documents, failing which it shall be deemed that the authorization is granted under these rules."*

That the Respondent Board finally granted the renewed Authorization dated 12.12.2022 under the Bio Medical Waste (Management) Rules, 2016 to the Respondent Hospital and the same is valid till 31.03.2027. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.

- o. That the contents of the corresponding paragraph are true. That in respect of the provisions of the Development Plan for Una Town issued by the Town and Country Planning Department, Himachal Pradesh, as per Clause/regulation 7.2.1.1 of Sr. No. 7.2.1 (Residential Use) the uses permitted in the area earmarked for Residential Use are Residences, **Hospitals**, Boarding Houses, Nurseries, Kindergartens and Schools, Clinics, Social and cultural Institutions, Public Utilities and buildings, except service and storage yards, agricultural gardens, nurseries and green houses, any neighborhood recreational uses including clubs and other semi- public recreational uses, accessory uses clearly incidental to residential uses which will not create a nuisance and eco-hazard. Relevant provision is reproduced herein below for the ready reference of this Hon'ble Tribunal:

*"7.2.1.1 Uses Permitted- Residences, Hospitals, Boarding-Houses, Nurseries, Kindergartens and*

*Schools, Clinics Social and Cultural Institutions, Public utilities and buildings, except service and storage yards; agriculture gardens, nurseries and green houses, any neighborhood recreational uses; including clubs and other semi- public recreational uses; accessory uses clearly incidental to residential uses which will not create a nuisance and eco-hazard."*

Further as per Clause/Regulation 7.1.(ii) of Sr. No. 7.1 (General Regulations) mixed land use is not prohibited unless otherwise a particular land use is hazardous. Relevant provision is reproduced herein below for the ready reference of this Hon'ble Tribunal:

*"(ii) General land use in the development plan has been contemplated for specified use. However, mixed land use shall not be prohibited unless otherwise a particular land use is hazardous in nature to the predominated use and fulfils the regulations fixed for the same."*

Therefore, it is humbly submitted that the Respondent herein is not running the hospital in violation of the Development Plan for Una Town issued by the Town and Country Planning Department, Himachal Pradesh. In recent past, a small portion was added in the premises and as an abundant precaution, though not required, the Respondent herein applied to the Department of Town and Country Planning, Una for change of building use (hospital site) and composition of additional construction of garage situated on the right side of the hospital. It is

submitted that the Special Area Development Authority, Una granted completion permission vide letter dated 19.01.2023. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.

4. That the contents of the corresponding paragraph are wrong and hence denied. It is denied that the Respondent No.8 is habitual in violating the green laws of the land. It is submitted that **as on date, the Respondent Hospital has Consent to Establish as well as Consent to Operate and also Authorization under the Bio Medical Waste (Management) Rules, 2016 and is running the hospital in full compliance as per the prescribed norms. It is submitted that the delay in grant of the Consents as well as the Authorization was a result of lapse on part of the officers of the Respondent Board and hence the Respondent Hospital cannot be held accountable for the same. It is in the humble submission of the answering Respondent herein that there is an adequate appropriate Sewage Treatment Plant which is being run efficiently of capacity 3 KLD installed in the premises and the sample result of the same have found to be well within the prescribed limits as per the report dated 14.12.2022 of the Respondent Board. Further the allegation of the Applicant that the Respondent Hospital is discharging all its Bio Medical Waste outside the hospital is erroneous and without any evidence on record. It is submitted that starting from the year 2014 till date, the Respondent Hospital has entered into Agreements with Bio Medical Waste Collection facilities for collection of Bio Medical Waste from the hospital and the same have been placed on record for the convenience of this Hon'ble Tribunal. It is pertinent to mention herein that the Applicant has not placed on record any evidence or any photo to establish or support his allegation that the Respondent Hospital is discharging all its Bio Medical Waste outside the**

hospital. It is therefore submitted that the allegations of the Applicant are only based out of personal rivalry and hence ought to be dismissed. The contents of the preliminary submissions are reiterated and not repeated herein for the sake of brevity.

THROUGH

  
A.R. TAKKAR, SHRIYA TAKKAR, UNNATI ANAND, KAPIL BAKSHI

MANAN TAKKAR & PRINCE SHARMA

ADVOCATES

M/s ARTLO

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DATE-13.03.2024

PLACE-GURUGRAM

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH NEW

DELHI

ORIGINAL APPLICATION NO. 820 OF 2022

**IN THE MATTER OF:**

NAVEEN KUMAR

...PETITIONER/APPLICANT

VERSUS

UNION OF INDIA & ORS

...RESPONDENTS

**AFFIDAVIT**

I, Dr, Akshey Kumar S/o Mr. K D Sharma, aged about 58 Years. R/o, Shivalik Hospital, Jhalera, Block Amb, District-Una, H.P.

I the above named deponent do hereby solemnly affirm and declare as under:-

1. That the above titled Reply has been drafted under the authority and instructions of the deponent and after perusing its contents, the deponent has duly signed it, and the contents of paragraph Nos. 1 to 4 thereof are true and correct to the knowledge of the deponent, and the same may be read as contents of this affidavit also, which are not being reproduced for the sake of brevity. No part of it is false and nothing material has been kept concealed therefrom.
2. That the contents of paragraphs no. 1 to 4 of above titled Reply are true and correct to my knowledge, no part of that is false and nothing has been kept concealed therefrom.





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*Akshey Kumar*  
DEPONENT  
Dr. Akshey Kr. Sharma  
MBBS M.S. (MAMC)  
Consultant Surgeon  
MCI No. 7841

VERIFICATION

Verified that the contents of paragraphs no. 1 to 2 of my above affidavit are true and correct to my knowledge. No part of it is false and nothing has been concealed therein.

*Akshey Kumar*  
DEPONENT  
Dr. Akshey Kr. Sharma  
MBBS M.S. (MAMC)  
Consultant Surgeon  
MCI No. 7841

*Dr. Akshay Kumar*  
*Mr. K D Sharma*  
*Shri Valit Hospital*  
*Shelershat*  
*6/3/2024*

*NOTARY*

## NAVEEN KUMAR VS UNION OF INDIA &amp; ORS

Rahul Chaudhry &lt;rahul@artlo.in&gt;

Wed 3/13/2024 3:09 PM

To:chambersofmanishkumar@gmail.com <chambersofmanishkumar@gmail.com>;aor-jasmeetsingh@gmail.com <aor-jasmeetsingh@gmail.com>;hppcb.cs@gmail.com <hppcb.cs@gmail.com>;advocateguravbansal@yahoo.com <advocateguravbansal@yahoo.com>

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 2 attachments (7 MB)

NAVEEN KUMAR VS UNION OF INDIA & ORS WA.pdf; NAVEEN KUMAR VS UNION OF INDIA & ORS Reply.pdf;

Dear Sir/ma'am

Please find attached herewith a scanned copy of the Reply and Written Arguments on Behalf of Respondent No. 8. in the captioned matter. i.e. NAVEEN KUMAR VS UNION OF INDIA & ORS (OA.820 of 2022)

Rahul Choudhary  
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