

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 678/2025**

IN THE MATTER OF: -

Sanjay Kumar

...Applicant

Versus

M/s The Hisar Golden Co-op. House building Society & Ors. ...Respondent(s)

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Filed by



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Place: New Delhi
Dated: 20.07.2026

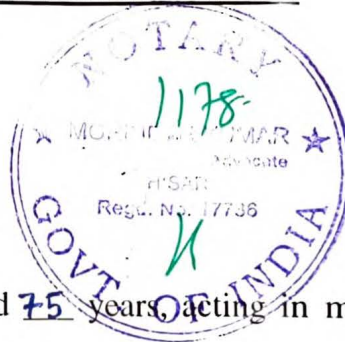
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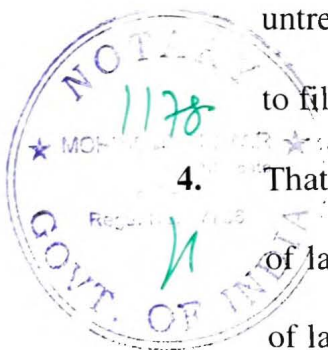
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REPLY ON BEHALF OF RESPONDENT NO. 1- M/S THE HISAR**GOLDEN CO-OP. HOUSE BUILDING SOCIETY****MOST RESPECTFULLY SHOWETH**

I, Ashok Kumar Gupta, aged 75 years, acting in my official capacity as President of M/S The Hisar Golden Co-Op. House Building Society do hereby solemnly affirm and state as under: -

1. That I am well conversant with the facts and circumstances of the present case and am duly authorized and competent to swear and file the present reply on behalf of Respondent No. 1.

2. The Applicant herein has approached this Hon'ble Tribunal with unclean hands and has made exaggerated and unsubstantiated claims in the present petition to the effect that the answering respondent society has permitted dumping of unsegregated municipal solid waste and toxic materials including bio-medical waste on a portion of society's land which is adjacent to the land of applicant, which has caused severe degradation of local environment.
3. That in this regard it is respectfully submitted that the allegations levelled by the Applicant against the answering respondent are completely false, frivolous and misconceived, in as much as, no untreated or residual waste was ever used by the answering respondent to fill its low-lying area.
4. That at the outset it is submitted that the society is owner in possession of land comprising in killa nos. 1103/21,22,23,24 whereas the owner of land adjacent to societies land comprising in **killa No. 1103/16-17-18-19-20** wanted to fill his low-lying land and do levelling and in this process those people had approached the officials / contractor of Municipal Corporation, Hisar, and has used good earth / bio-soil generated from bio remediation and bio mining of old municipal dump sites for their land filling.
5. That, however, in this process, inadvertently, some good earth / bio-soil was also dumped in societies land which has now been removed,



and therefore, the allegation levelled by the Applicant in the present petition being completely mischievous and scandalous and are liable to be rejected outrightly. It is pertinent to mention that the land in question belonging to the society is presently fully clear and at present no good-earth/bio-soil is laying at the spot.

6. That it is pertinent to mention that even otherwise also the use of said good-earth/bio soil for filling low-lying land is fully permitted in law even as per guidelines issued by Central Pollution Control Board for the disposal of legacy waste (2019) and the same does not violate any environmental norms or rules.
7. The lastly, it is submitted that the present Application is an outcome of factionalism among the members of society and is a clear case of forum shopping and abuse of process. It is further submitted that the photographs and videos annexed by the applicant with the present petition have been selectively chosen and do not reflect the true state of affairs. In addition, the Applicant has failed to produce any independent scientific report, laboratory analysis of soil/water, or any authentic evidence to substantiate that any untreated solid or medical waste was used to fill the low lying site of the Respondent Society.
8. That the deponent has the highest regard and utmost respect for this Hon'ble Tribunal and undertakes to faithfully comply with every order



and direction that may be passed by this Hon'ble Tribunal from time to time.

Id. by

Apurva Adv.

[Signature]

DEPONENT

VERIFICATION

Verified at Hisar on this 22nd day of July 2026 that the contents of the above affidavit are true to my knowledge and no part of it is false and nothing material has been concealed therefrom



[Signature]

DEPONENT

Attested as Identified

[Signature]

NOTARY, HISAR
22 JUL 2026