

N.D.H.:01.07.2025

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO.480 OF 2024**

IN THE MATTER OF:

MR. VINAY CHHILLAR AND ANOTHER APPLICANTS

VERSUS

HARYANA STATE POLLUTION CONTROL

BOARD & OTHERS ... RESPONDENTS

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Place: New Delhi**Date:** 25.06.2025

FILED BY:


(GAURAV AGARWAL)
 Advocate for Respondent No.10

GRV LEGAL
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O-703, Aditya Mega City,
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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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VINAY CHILLAR AND ANOTHERAPPLICANTS

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HARYANA STATE POLLUTION
CONTROL BOARD AND OTHERSRESPONDENTS

**REPLY ON BEHALF OF RESPONDENT NO. 10,
M/S SHIVJI BHATTA COMPANY**

1. That the present OA is filed by the Applicant alleging that the Respondent brick kiln are set up illegally without proper approvals and being operated without obtaining proper consent and causing air pollution and soil degradation. It is further alleged that the said answering Respondent are using coal dust and plastic waste as fuel causing high pollution.
2. That this Hon'ble Tribunal considering the issue involved in the case directed issuance of notice by order dated 24.05.2024. On the next date of hearing Hon'ble Tribunal granted time to the answering Respondent to file their response to the OA.
3. That the answering Respondent herein has been read over and explained in Hindi the contents of the entire Original Application and is, thereafter, giving a reply to the allegations made therein. The answering Respondent raises a preliminary objection to the Original Application being not maintainable as the same is not filed in compliance with Rule 8(1) of the NGT Practice And Procedure Rules 2011, as the memorandum of Application is not

properly verified, nor the affidavit is sworn in terms of O. 19 R. 3 of CPC.

4. That, without prejudice to the preliminary objections, on merits of the case, at the outset all allegations made in the Original Application are denied and not admitted except to the extent expressly admitted herein. The allegations made in the Original Application are not only false but is an attempt to abuse the process of law of this Court by the Applicants in order to gain illegal financial benefit from the answering Respondent.
5. That Respondent no. 10 is brick kiln in name of M/s Shivji Bhatta Company which is a proprietorship concern situated at vill. Kanonda. Jhajjar, Haryana and it is a proprietorship concern. The said Respondent is being run by the deponent Rajesh Kumar.
6. That Respondent no. 10 was set up as much as 15 years back. The said Respondent was established after obtaining licence from the State Government under the Haryana Control of Brick Supplies Order 1972. The answering Respondent was granted licence no. 589 BKJ and the said license has regularly been renewed from time to time. A true copy of the licence of M/s Shivji Bhatta Company dated 03.01.2011 is **ANNEXURE A-1**
7. That since the introduction of the GST the answering Respondent is operating after obtaining registration under the GST. The answering Respondent has got itself registered under the GST since 2018. Hence, the allegations in Original Application that the said brick klins are unaccounted and unregistered is false and a concocted narration of fact. A true

copy of the GST Registration Certificate of answering Respondent dated 28.07.2018, is **ANNEXURE A-2**.

8. That in respect of the allegations that the answering Respondent is operating without proper consent from the HSPCB, it is submitted that the allegations are false and clear attempt to mislead this Tribunal. The answering Respondent have CTO dated 08.01.2023 and is operating in strict compliance of the same. A true copy of CTO dated 08.01.2023 answering Respondent is **ANNEXURE A-3**
9. That it is submitted that the answering Respondent is allowed to operate on bio mass fuel 4 tons per day. The answering Respondent has never operated on any other fuel than the allowed fuel and since its establishment operating only on bio mass.
10. That it is incorrect and false that the answering Respondent is operating on plastic waste as source of fuel. The Applicants have made bald assertions in the Original Application without any prima facie evidence or proof in support of his allegations. Hence, the same deserves to be rejected. So far as the allegations pertaining the plastic factories selling waste to brick kilns it is submitted that the same is a vague and general allegation. The answering Respondent has neither bought any such plastic waste nor are using any such waste. The Applicants has failed to show that the answering Respondent is in any way connected to the sale of plastic waste by any of the alleged plastic factories.
11. That the further allegations relating to the discharge of water is misplaced and misleading. The answering Respondent do not

discharge any water as the brick kilns are not water intensive industry. Mainly, requirement of water is to make the clay with soil and for drinking purpose. There is no discharge of the water from the brick kilns. The perusal of the CTO also shows that the mode of discharge and effluent parameters says 'NA'. Thus, no case is made out on the basis of the aforesaid allegations in Original Application.

12. That it is pertinent to mention at this stage that the Applicant herein has not approached this Tribunal with clean hands. It is incorrect and false to state that the Applicants have filed the Original Application with intention to secure a pollution free environment and for taking down the illegal brick kilns. In fact Applicant No. 1 is a blackmailer and has earlier approached the answering Respondent and other brick kiln owners demanding financial benefit to run brick kilns in the area. As the answering Respondent denied to bent down to illegal demand of the Applicant no. 1 the present false Original Application is filed abusing the process of law. A true copy of the affidavits made by some of the brick kilns owners dated 05.08.2024 is **ANNEXURE A-4.**
13. That it is also pertinent to mention that a police complaint was also filed against the said Applicant no. 1 along with call recording of extortion and the criminal case is pending against the Applicant no.1. In this respect the Hon'ble Supreme Court has held in case of **State of U.P. v. Uday Education and Welfare Trust, Civil Appeal No. 2407 -2412 of 2021 decided on 21.10.2022** that when the credentials and bonafides of a

litigant approaching the learned NGT are seriously raised, the same cannot be ignored.

“99. We find that before a litigant is permitted to knock the doors of justice and seek orders which have far reaching effects of affecting the employment of thousands of persons, stopping investment in the State, prejudicing the interests of the farmers; the credentials and bonafides of the applicants must be tested. In the present case, there is scope to infer that the litigation could be at the behest of the existing WBIs who wanted to avoid competition and continue to get raw material at a cheaper rate. There is also scope to infer that it could be at the behest of the WBIs in the adjoining Yamuna Nagar district of Haryana where lakhs of tons of timber is exported from the State of Uttar Pradesh. There is scope to infer that it could be in the interest of middlemen who are engaged in exporting timber from Uttar Pradesh to Haryana. **We would, therefore, only request the learned NGT that, when credentials and bonafides of such litigants are seriously raised and when entertaining the grievance of such litigants, which is likely to adversely affect the rights of many, it should ensure the bonafides and credentials of such litigants.**”

14. That in light of the aforesaid this Tribunal shall enquire from the Applicant the source of funds for filing numerous applications before this Tribunal, reasons for not arraying as party other bick klins out of admittedly stated 400 brick klins in the region, reason for filing of petition with false facts without ascertaining from the HSPCB about the CTO of the answering Respondent.
15. That it is lastly submitted that the answering Respondent has always complied and followed each and every rule and law scrupulously. However, the answering Respondent states that in the event any further direction, if any is passed by this Tribunal, the answering Respondent shall be obliged to follow the same as well. It is lastly submitted that considering the fact of compliance by the answering Respondent and the fact that the answering

Respondent is a source of livelihood to huge section of society who are directly and indirectly engaged with the answering Respondent, this Tribunal may be pleased to dismiss the O.A. with heavy cost to the Applicants.

Rajesh Kumar
Proprietor,
M/s Shivji Bhatta and Company
(Respondent no. 10)

Through


(GAURAV AGARWAL)
Advocate for Respondent No. 10

GRV LEGAL
Advocates and Legal Consultants
O-703, Aditya Mega City,
Vaibhav Khand, Indirapuram,
Ghaziabad, U.P NCR- 201014
Mob- 8802911392
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**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO.480 OF 2024**

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MR. VINAY CHHILLAR AND ANOTHER

..... APPLICANTS

VERSUS

HARYANA STATE POLLUTION CONTROL
BOARD & OTHERS

... RESPONDENTS

AFFIDAVIT

I, RAJESH KUMAR, aged about 51 years, S/o Shri Deep Ram, R/o Bahadurgarh, Ladrawan, District Jhajjar, Haryana-124507, do hereby state on solemn affirmation as under:

1. That the deponent is the Proprietor of the answering Respondent in the present Original Application as such I am well conversant with the facts and circumstances of the present case and hence, competent to swear this affidavit.
2. That I have gone through the accompanying Reply from para 1 to 15 and say that the contents thereof are true and correct to the best of my knowledge and belief and I believe the same to be true.
3. That the Annexures R-1 and R-4 to the reply are true copy of the documents.

Solemnly affirmed on this ___ day of June, 2025 at Jhajjar, Haryana.

Rajesh Kumar

DEPONENT



VERIFICATION

Verified at Jhajjar, Haryana on this ___ day of June, 2025 that the contents of my above affidavit are true and correct to my knowledge and no part of it is false and nothing material has been concealed therefrom.

Rajesh Kumar

DEPONENT

ATTESTED
MK 18/6/25
Mukesh Kumar Saini
Advocate & Notary
Bahadurgarh Jjr. (Hr.)

THE HARYANA CONTROL OF BRICKS SUPPLIES ORDER 1972

Licence under clause 6 of the Haryana Control of Bricks supplies order.

Licence No. 589-BKJ

District:- Jhajjar

Name : M/S. SHIVJI BHATTA COMPANY, B.K.O. KANONDA
TEHSIL BAHADURGARH DISTT. JHAJJAR.

Percentage through:- **Sh. Chand Singh (Partner) S/O Sh. Mukhtyaar Singh**
R/o V&P.O. Ladrawan Teh. Bahadurgarh Distt. Jhajjar.

Is Licenced to M/s SHIVJI BHATTA COMPANY, B.K.O. KANONDA TEHSIL BAHADURGARH DISTT. JHAJJAR manufacture, sell or supply bricks at there mentioned the addresses of the place of business Khawat No 246 Min Khatoni No. 256 Killa Numbrain No 122// 21, 22/1, & 128//1 Village Kanonda Tehsil Bahadurgarh Distt. Jhajjar.

2- That Licence shall be valid up to 31st March 2011.

District Food & Supplies Commission

Jhajjar 27/01/2011

Date: 05-01-2011

Note: Description of Bricks according to clause 2 (a) of the East Punjab Control of Bricks Supplies Act 1949, is as under.

"Brick means any piece of burnt clay having a geometrical shape fired in a kiln".

Renewal Endorsement

Date from which Renewal applicable	Date of expiry	Signature of issuing Authority	Remarks
------------------------------------	----------------	--------------------------------	---------

Licence Renewed up to 31-3-2015	Licence Renewed up to 31-3-2019	Subject to the condition that BKO Owner will not operate his BKO in next session until he do not convert his BKO in fully Zig-Zag technology	Licence Renewed up to 31-3-2012
D.F.S.C. Jhajjar	D.F. & S.C. JHAJJAR	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar
Licence Renewed up to 31-3-2016	Licence Renewed upto 31-3-24	D.F.S.C. Jhajjar	Licence Renewed upto 31-3-23
D.F.S.C. Jhajjar	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar
Licence Renewed upto 31-3-2017	Licence Renewed upto 31-3-2020	D.F.S.C. Jhajjar	Licence Renewed up to 31-3-2013
D.F.S.C. Jhajjar	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar
Licence Renewed upto 31-3-2018	Licence Renewed upto 31-3-2021	D.F.S.C. Jhajjar	Licence Renewed up to 31-3-2014
D.F.S.C. Jhajjar	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar	D.F.S.C. Jhajjar

**ANNEXURE A-2**

Government of India
Form GST REG-06
 [See Rule 10(1)]

Registration Certificate

Registration Number : 06ARVPK2796D1ZC

1.	Legal Name	RAJESH KUMAR			
2.	Trade Name, if any	Shivji Bhatta Co.			
3.	Constitution of Business	Proprietorship			
4.	Address of Principal Place of Business	Village Kanonda, Village Kanonda, Kanonda, Jhajjar, Haryana, 124507			
5.	Date of Liability	01/07/2017			
6.	Period of Validity	From	01/07/2017	To	NA
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority				
Signature		Validity unknown Digitally signed by DS GOODS AND SERVICES TAX NETWORK 1 Date: 2018.07.26 03:19:19 IST			
Name					
Designation					
Jurisdictional Office					
9.	Date of issue of Certificate	28/07/2018			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

Annexure A



GSTIN

06ARVVPK2796D1ZC

Legal Name

RAJESH KUMAR

Trade Name, if any

Shivji Bhatta Co.

Details of Additional Places of Business

Total Number of Additional Places of Business in the State 0



सत्यमेव जयते

GSTIN

06ARVPK2796D1ZC

Legal Name

RAJESH KUMAR

Trade Name, if any

Shivji Bhatta Co.

Details of Proprietor

1	Name	Rajesh Kumar
	Designation/Status	Proprietorship
	Resident of State	Haryana

Annexure B

111



HARYANA STATE POLLUTION CONTROL BOARD



HSPCB

SCF No. 42 & 43, Shopping Centre, Sector-6, Huda,
Bahadurgarh Ph. 01276-243077 (O) Email:-

hspcbroadh@gmail.com

E-mail: hspcb@hry.nic.in

ANNEXURE A-3

No. HSPCB/Consent/ : 313116123JHACTOA31892090

Dated:08/01/2023

To.

M/s :Shivji Bhatta Company
Village Kanonda Distt Jhajjar

Subject: Grant of consent to operate to M/s Shivji Bhatta Company.

Please refer to your application no. 31892090 received on dated 2022-12-22 in regional office Bahadurgarh. With reference to your above application for consent to operate, M/s Shivji Bhatta Company is here by granted consent as per following specification/Terms and conditions.

Consent Under	AIR
Period of consent	01/04/2023 - 31/03/2025
Industry Type	Brickfields (excluding fly ash brick manufacturing using lime process)
Category	ORANGE
Investment(In Lakh)	48.349998
Total Land Area(Sq. meter)	10900.0
Total Builtup Area(Sq. meter)	3800.0
Quantity of effluent	
1. Trade	0.0 KL/Day
2. Domestic	0.0 KL/Day
Number of outlets	0.0
Mode of discharge	
1. Domestic	NA
2. Trade	NA
Domestic Effluent Parameters	
1. NA	
Trade Effluent Parameters	
1. NA	
Number of stacks	1
Height of stack	
1. STACK ATTACHED TO GRAVITATIONAL SETTLING CHAMBER	30 METER
Emission parameters	

1. SPM	250 mg/m ³	13
Product Details		
1. BRICKS	14000 Numbers/ day	
Capacity of boiler		
1. NA		
Type of Furnace		
1. NA		
Type of Fuel		
1. BIOMASS	4 MT/DAY	
Raw Material Details		
SOIL	35 Metric Tonnes/Day	
WATER	10 Kilo Liters/Day	

*Regional Officer, Bahadurgarh
Haryana State Pollution Control Board.*

Terms and conditions

1. The applicants shall maintain good house keeping both within factory and in the premises. All hose pipelines valves, storage tanks etc. shall be leak proof. In plant allowable pollutants levels, if specified by State Board should be met strictly.
2. The applicant/company shall comply with and carry out directive/orders issued by the Board in this consent order at all subsequent times without negligence of his /its part. The applicant/company shall be liable for such legal action against him as per provision of the law/act in case of violation of any order/directives. Issued at any time and or non compliance of the terms and conditions of his consent order.
3. The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
4. Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
5. If due to any technological improvement or otherwise this Board is of opinion that all or any of the conditions referred to above required variation (including the change of any control equipment either in whole or in part) this Board shall after giving the applicant an opportunity of being heard vary all or such condition and there upon the applicant shall be bound to comply with the conditions so varied.
6. The industry shall provide adequate arrangement for fighting the accidental leakages, discharge of any pollutants gas/liquids from the vessels, mechanical equipment etc. which are likely to cause environment pollution.
7. The industry shall comply noise pollution (Regulation and control) Rules, 2000.
8. The industry shall comply all the direction/Rules/Instructions as may be issued by the MOEF/CPCB/HSPCB from time to time.
9. The industry shall ensure that various characteristics of the effluents remain within the tolerance limits as specified in EPA Standard and as amended from time to time and at no time the concentration of any characteristics should exceed these limits for discharge.
10. The industry would immediately submit the revised application to the Board in the event of any change in the raw material in process, mode of treatment/discharge of effluent. In case of

issued from time to time.

SHAKTI SINGH
Regional Officer, Bahadurgarh
Haryana State Pollution Control Board.

Digitally signed by SHAKTI SINGH
Date: 2023.01.08 11:19:20
+05'30'

HARYANA STATE



शपथ-पत्र

RAKESH KUMAR
Stamp Vendor
Bahadurgarh

05/08/2024

Rishin Prakash C Sanyal

- 1-मैं Rishin भट्टा नाम श्रीवाहन प्रकाश सन्याल
- 2-मैं अपना भट्टा श्रीवाहन इतने वर्षों से गांव श्रीवाहन जिला झज्जर
.....में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,
फूड सप्लाई , माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन
लेकर चला रहा हूं ।
- 3.एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव
बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी
भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि
अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं
आपके भट्टों को नहीं चलने दूंगा ।
- 4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक
04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में
ऑडियो कॉल रिकॉर्डिंग रे रखी है ।
- 5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।

Chand Singh

शपथकर्ता / भट्टा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा
ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं
गया है ।

दिनांक 05-08-2024

Chand Singh
शपथकर्ता / भट्टा मालिक

ATTESTED
MKS 5/8/24
Mukesh Kumar Saini
Advocate & Notary
Bahadurgarh, Jhajjar (HR)





RAKESH KUMAR
Stamp Vendor
Bahadurgarh

13626

05/08/2024
Ramesh

शपथपत्रकर्ता Bhatta

1-मैं शिवजी राजु भट्टा नाम शिवजी मठावा

2-मैं अपना भट्टा 10 वर्ष इतने वर्षों से गांव कालावा जिला झज्जर

में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग, फूड सप्लाई, माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन लेकर चला रहा हूं।

3. एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं आपके भट्टों को नहीं चलने दूंगा।

4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक 04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में ऑडियो कॉल रिकॉर्डिंग रे रखी है।

5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं।



Ramesh

शपथकर्ता/भट्टा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं गया है।

दिनांक 05-08-2024

Ramesh

शपथकर्ता /भट्टा मालिक

ATTESTED

M. K. SAINI

Mukesh Kumar Saini,
Advocate & Notary
Bahadurgarh, Jhajjar (HR).



RAKESH KUMAR
Stamp Vendor
Bahadurgarh

13033

05/08/2024

Ramdas Sharma Son

- 1-मैं शपथकर्ता भट्ठा नाम शपथकर्ता
- 2-मैं अपना भट्ठा 18 वर्ष इतने वर्षों से गांव वाराणसी जिला वाराणसी
.....में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,
फूड सप्लाई , माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन
लेकर चला रहा हूं ।
- 3.एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव
बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी
भट्ठा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि
अगर इस क्षेत्र में ईट भट्ठे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं
आपके भट्ठों को नहीं चलाने दूंगा ।
- 4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक
04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में
ऑडियो कॉल रिकॉर्डिंग रे रखी है ।
- 5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।



Ramdas

शपथकर्ता / भट्ठा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा
ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं
गया है ।

दिनांक 05-08-2024

Rakesh
शपथकर्ता / भट्ठा मालिक

ATTESTED

Mukesh Kumar Saini
Advocate & Notary
Bahadurgarh, Haryana (HR)



RAKESH KUMAR
Stamp Vendor
Bahadurgarh

13622

05/08/2024

Dindar Singh Bhagwan Singh & Son
Rampur

1-मैं कुमार भट्टा नाम सुखदेव

2-मैं अपना भट्टा 1099 इतने वर्षों से गांव बामनौली जिला झज्जर

में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग, फूड सप्लाई, माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन लेकर चला रहा हूँ।

3. एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं आपके भट्टों को नहीं चलने दूंगा।

4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक 04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में ऑडियो कॉल रिकॉर्डिंग रे रखी है।

5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूँ।



मैं तसदीक करता हूँ कि उपरोक्त ब्यान मेरे इलम वा ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं गया है।

दिनांक 05-08-2024

शपथकर्ता / भट्टा मालिक

शपथकर्ता / भट्टा मालिक

ATTESTED

Mukesh Kumar Saini
Advocate & Notary
Bahadurgarh, Jhajar (HR)



9 RAKESH DIXIT
Stamp Vendor
Bahadurgarh

13627
05/08/2024

Shankar Bhatta Cu

- 1-मैं अनुराधा कुमार भट्टा नाम शंकरभट्टा कु
- 2-मैं अपना भट्टा 5 वर्ष इतने वर्षों से गांव कानौली जिला झज्जर
में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,
फूड सप्लाई , माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन
लेकर चला रहा हूं ।
- 3.एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव
बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता हैं यह व्यक्ति सभी
भट्टा मालिकों से रंगदारी की मांग कर रहा हैं उसका यह कहना हैं कि
अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं
आपके भट्टों को नहीं चलने दूंगा ।
- 4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक
04-08-2023 को दे रखी हैं इस शिकायत के साथ हम सबूत के रूप में
ऑडियो कॉल रिकॉडिंग रे रखी हैं ।
- 5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।

Shankar Bhatta
शपथकर्ता / भट्टा मालिक



सिद्धांत के आधार से सही व ठीक हैं तथा इसमें कुछ भी छुपाया नहीं
रखा है ।
दिनांक 05-08-2024

Shankar Bhatta
शपथकर्ता / भट्टा मालिक

ATTESTED
Mukesh Kumar Saini
Advocate & Notary
Bahadurgarh, Jhajar (HR)

- 1-मैं Lakshya Debas भट्टा नाम Suman Bhatta Company
- 2-मैं अपना भट्टा 25 इतने वर्षों से गांव Mukundpur जिला Jhajjar
में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,
 फूड सप्लाय, माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन
 लेकर चला रहा हूं ।
- 3.एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव
 बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी
 भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि
 अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं
 आपके भट्टों को नहीं चलाने दूंगा ।
- 4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक
 04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में
 ऑडियो कॉल रिकॉर्डिंग रे रखी है ।
- 5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।



Lakshya Debas

शपथकर्ता / भट्टा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा
 ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं
 गया है ।

दिनांक 05-08-2024

शपथकर्ता / भट्टा मालिक

ATTESTED
Mukesh Kumar Saini

**Mukesh Kumar Saini,
 Advocate & Notary
 Bahadurgarh, Jhajjar (HR)**

IN THE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO.. 489 OF 2024

VAKALATNAMA

IN THE MATTER OF :

MR. VINAY CHHILLAR & ANOTHER

...Applicant

Versus

HARYANA STATE POLLUTION CONTROL BOARD & OTHERS

...Respondents

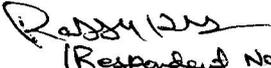
KNOW ALL to whom these present shall come that I/We SHIVJI BHATTA the above named Respondent No. 10 do hereby appoint SRI GAURAV AGARWAL (hereinafter called the advocate/s) to be my/our Advocate in the above noted case and authorize him :- To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/ us. To sign, file verify and present pleadings, appeals cross objections or petitions for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages. To file and take back documents to admit and/or deny the documents of opposite party. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings. The deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case. To appoint and instruct any other Legal Practitioner, authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think it to do so and to sign the Power of Attorney on our behalf. And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes. And I/We undertake that I / we or my /our duly authorized agent would appear in the Court on all hearings and will inform the Advocates for appearance when the case is called. And I /we undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain himself.

Dated this 28th day of MAY, 2025

Accepted, identified and satisfied about the due execution of the Vakalatnama


(GAURAV AGARWAL)
Advocate
UP/03872/2009

Memo Of Appearance


(Respondent No. 10)
Applicant/ Respondent
Raju Kumar,
Proprietor, Shiviji Bhatta.

To
The Registrar
National Green Tribunal
New Delhi

Sir,
Please enter my appearance for the above named Petitioners/Plaintiff(s)/Appellant(s)/Respondent(s)/Defendant(s)/Caveator(s) Intervener(s) in the above mentioned Petition/Appeal/Suit/Reference.

Thanking you,

Dated : 06.06.2025




Yours Sincerely,

(GAURAV AGARWAL)
Advocate