

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.16

GRV LEGAL
 Advocates and Legal Consultants
 O-703, Aditya Mega City,
 VaibhavKhand, Indirapuram,
 Ghaziabad, U.P. NCR- 201014
 Mob.: 8802911392
 Email. : gaurav@grvlegal.in

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CONTROL BOARD AND OTHERSRESPONDENTS

REPLY ON BEHALF OF RESPONDENT NO. 16

M/S DABAS BHATTA (M/S SUMAN BHATTA CO.)

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. 16 is brick kiln in name of M/s Suman Bhatta Company and is a proprietorship concern situated at vill. Makandpur, Jhajjar, Haryana being operated by the deponent Sandeep Dabas. There is only one bhatta in the entire village. The Applicant has arrayed the Respondent with incorrect name as the Dabas is the family name (*gotra*) of the owner. The fact of arraying the Respondent with incorrect name throws light on the fact that the Applicants merely got the name of the owner in order to make illegal and unlawful demands but on refusal to honour his demands, he made their brick kiln party with the owners name and not the correct legal name. This is due to the fact that the Applicants does not have any grievance with the respective brick klins but with the owners for not fulfilling its illegal and unlawful demand. Had the Applicants have any real grievance they would have found out the name of the entity before making it a party.
6. That Respondent no. 16 was set up as much as 27 years back in 1998. 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. 244 BKJ and the said license has regularly been renewed from time to time. Moreover, with GST coming into effect the Respondent is a registered entity with department. 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 licence of M/s Suman Bhatta Company dated 06.03.1998 is **ANNEXURE A-1**

7. 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 of answering Respondent is **ANNEXURE A-2**
8. 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.
9. 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 klins it is

submitted that the same is a vague and general allegation. The answering Respondent has neither bought any such plastic waste nor is using any such plastic waste as fuel. 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.

10. 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 effluent discharge of the water from the brick kilns the CTO specifically mentioned NA for the discharge. Thus, no case is made out on the basis of the aforesaid allegations in Original Application.
11. 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-3.**

12. 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.**”

13. 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.

14. 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.

Sandeep Dabas
Proprietor,
M/s Dabas Bhatta
(M/s Suman Bhatta Co.)
(Respondent no. 16)

Through



(GAURAV AGARWAL)

Advocate for Respondent No. 16

GRV LEGAL
Advocates and Legal Consultants
O-703, Aditya Mega City,
Vaibhav Khand, Indirapuram,
Ghaziabad, U.P NCR- 201014
Mob- 8802911392
Email- gaurav@grvlegal.in

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AFFIDAVIT

I, LAKSHYA DABAS, aged about 23 years, S/o Shri Sandeep Dabas, Resident of B- 214, Pitampura, Saraswati Vihar, North West Delhi-110034, 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 14 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-3 to the reply are true copy of the documents.

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

Lakshya Dabas
DEPONENT

VERIFICATION

Verified at Delhi, 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.

Lakshya Dabas
DEPONENT

ATTESTED

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



काम मिलने का पता:-हरद्वार बुक डिपो, गीता भवन चौक, सोनीपत (हरियाणा)

ANNEXURE A-1

D.F.S.C.
Jhajjar

FORM B

THE HARYANA CONTROL OF BRICKS SUPPLIES ORDER, 1972.

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

Licence No... 244 B.K.J.
District... JHAJJAR

Name... M/s. Suman Bhatta Co. BKO Mukandpur Teh. B.Gash.
Percentage... Through Smt. Vidya Wati w/o Sh. Ramesh Singh (Prop).
Postal Address... Rf. 2.14, Saraswati Vihar, New Delhi

Is Licenced to M/s. Suman Bhatta Co. BKO Mukandpur

manufacture, sell or supply bricks at (here mentioned the addresses of the place of business Khasra Nos: 25 25 14 Village Mukandpur

2. That licence shall be valid up to 31st March next from the day on which it is issued.
Valid up to 31-3-1998.

Distt. Food & Supplies Controller,
District Magistrate,
JHAJJAR

Dated... 6th March, 1998.

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

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

Licence Renewed upto 31-3-24

Renewal Endorsement

Licence Renewed up to 31-3-2015

D.F.S.C.
Jhajjar

Licence Renewed up to 31-3-2019
Subject to the condition that BKO owner will not operate his BKO in any way he do not convert his BKO in any way

1. Date from which renewal applicable	2. Date of expiry	3. Signature of issuing authority	4. Remarks
		D.F.S.C. Jhajjar	

Licence renewed up to 31-3-2022

Licence Renewed upto 31-3-23

D. F. & S. C.,
JHAJJAR

D.F.S.C.
Jhajjar

Licence Renewed up to 31-3-2013

Licence Renewed upto 31-3-2021

D.F.S.C.
Jhajjar

Licence Renewed up to 31-3-2019

D.F.S.C.
Jhajjar

Licence Renewed upto 31-3-2020

Licence Renewed up to 31-3-2014

D.F.S.C.
Jhajjar

Licence Renewed up to 31-3-2012

D.F.S.C.
Jhajjar

Licence Renewed up to 31-3-2012

D.F.S.C.
Jhajjar

Licence Renewed up to 31-3-2014

D.F.S.C.
Jhajjar

D.F.S.C.
Jhajjar

Licence Renewed upto 31-3-2019
D.F.S.C. Jhajjar



District Town Planner, Jhajjar

DTP, Jhajjar, Mini Secretariat, Jhajjar., web site: www.tpharyana
Phone: +91 1251 253111, e-mail: dtp1.jhajjar.tcp@gmail.com

To

M/s Suman Bhatta Co.,
Village Mukandpur, Tehsil Bahadurgarh & District Jhajjar.

Memo No. RBK-5868A1/JR/DTP-P/6192/2024 Dated: 11/09/2024

Subject: Application for renewal of brick kiln license for year 2024-2025.

RENEWAL OF LICENCE (FORM- BK-II. Sec Rule-35)

Licence under section-8 of the Haryana Scheduled Roads and Controlled Areas Restriction of Unregulated Development Act, 1963 for Brick Field in the Additional Controlled Area Bahadurgarh, Tehsil Bahadurgarh and District Jhajjar.

Name & Address : **M/s Suman Bhatta Co.,**

Village Mukandpur, Tehsil Bahadurgarh & District Jhajjar.

Purpose of Licence : Renewal of Licence of Brick Kiln.

Description of land : **VESSEL:-** Khasra No 25/8, 13 in the revenue estate of village Mukandpur, Tehsil Bahadurgarh & District Jhajjar.

Brick Field for pather only (no excavation) comprising in Khasra Nos. 14/23, 24, 25/3, 4 falling in the revenue estate of village Mukandpur, Tehsil Bahadurgarh & District Jhajjar.

Licence is hereby renewed upto **31/03/2025** under section 8 of the Haryana Scheduled Roads and Controlled Areas Restriction of Unregulated Development Act, 1963, as per the particulars given above (to be renewed annually thereafter) subject to the following conditions:-

- (i) The position of the land earmarked for vessel and brick field as shown in the approved site plan has already been supplied along with original licence.
- (ii) No permanent buildings shall be constructed at the site.
- (iii) No excavation shall be done within the 30 meters depth along the road.
- (iv) That the necessary permission will be obtained by the owner at their own level from MOEF as decided by Hon'ble Supreme Court of India in I.A. Nos. 12-13 of 2011 in SLP (C) No. 19628-19629 of 2009, Deepak Kumar etc. Verses State of Haryana and Others etc.
- (v) The condition imposed by Financial Commissioner and Principal Secretary of Govt. of Haryana Food and Supplies Deptt. vide memo no. 2B.K.-7/7/2010/22595 dated 21/12/2010 will be complied with.
- (vi) Contravention of any of the condition of licence or provisions of the Haryana Schedule Roads and Controlled Areas Restriction of Unregulated Development Act, 1963 and rules framed there under shall construe automatic cancellation of this licence.
- (vii) This Licence does not provide any immunity from the applicability of provisions of any other existing Act/Rules or the instructions of the Govt. applicable to the proposed site.

District Town Planner
Jhajjar

Endorse To: JR/DTP-P/6193-6196/2024

- 1 District Magistrate, Jhajjar
2. District Mining Officer, Rohtak
3. Regional Officer, Haryana State Pollution Control Board, Bahadurgarh
4. District Food & Supply Controller, Jhajjar


District Town Planner
Jhajjar



HSPCB

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

hspcbrobdh@gmail.com

E-mail: hspcb@hry.nic.in

ANNEXURE A-2

No. HSPCB/Consent/ : 313116123JHACTOA6109721

Dated:08/01/2023

To.

M/s :Suman Bhatta Company
Village Mukandpur Distt Jhajjar

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

Please refer to your application no. 6109721 received on dated 2022-12-22 in regional office Bahadurgarh. With reference to your above application for consent to operate, M/s Suman 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)	47.150002
Total Land Area(Sq. meter)	12800.0
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	12
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

164 change of process at any stage during the consent period, the industry shall submit fresh consent application alongwith the consent to operate fee, if found due, which may be on any account and that shall be paid by the industry and the industry would immediately submit the consent application to the Board in the event of any change during the year in the raw material, quantity, quality of the effluent, mode of discharge, treatment facilities etc.

11. The officer/official of the Board shall reserve the right to access for the inspection of the industry in connection with the various process and the treatment facilities. The consent to operate is subject to review by the Board at any time.

12. Permissible limits for any pollutants mentioned in the consent to operate order should not exceed the concentration permitted in the effluent by the Board.

13. The industry shall pay the balance fee, in case it is found due from the industry at any time later on.

14. If the industry fails to adhere to any of the conditions of this consent to operate order, the consent to operate so granted shall automatically lapse.

15. If the industry is closed temporarily at its own, they shall inform the Board and obtain permission before restart of the unit.

16. The industry shall comply all the Directions/ Rules/Instructions issued from time to time by the Board.

Specific Conditions :

1. That the unit will abide by MoEF notification regarding fly ash notification regarding use of fly ash as per directions of Hon'ble Supreme Court/ High Court & ensure use of 25% of fly ash on weight to weight basis for manufacturing bricks as pre the latest direction issued by CPCB.
2. That if the unit will found using illegal fuel at any stage, CTO so granted will be revoked without giving any further notice beside taking action u/s 31 A of Air Act.
3. The unit will not excavate brick earth or ordinary clay more than 1.5 meters from adjoining ground.
4. The unit will strictly comply with the directions of Hon'ble Courts/ NGT/CPCB/EPCA/Board issued from time to time.
5. Unit will abide with the decision of appeal pending before Hon'ble apex court. Unit will comply with the direction/conditions of EPCA/CPCB/MoEF issued from time to time failing which CTO so granted will be revoked without giving any further notice.
6. Unit will provide adequate sampling hole, platform and ladder as directed by CPCB on the chimney/Stack of Brick kiln.
7. The unit will pave the adjoining area of the Brick Kiln with Bricks as per the Directions of CPCB for controlling the fine dust emission.
8. Unit will submit the record regarding use of fly ash being obtained from thermal power plant in order to ensure compliance directions issued by CPCB.
9. The unit will not start its operation in violation of the Hon'ble NGT orders and Unit will comply Hon'ble NGT directions pertaining to brick kilns in Utkarsh Pawar in OA 1016/2019.
10. That the unit will not use the illegal fuel such as waste rubber, plastic etc.
11. The unit will comply with the directions of Food & Civil Supply and consumer affair dated 28.07.2017.
12. The unit will strictly comply with the directions of CPCB issued vide letter no. 946 dated.14.11.17 for brick kilns.
13. The unit will comply with all the directions of commission for air quality management

issued from time to time.

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

Digitally signed by SHAKTI
SINGH
Date: 2023.01.08 11:16:10
+05'30'





शपथ-पत्र

ANNEXURE A-3

RAKESH KUMAR
Stamp Vendor
Bahadurgarh

05/08/2024

Rishin Prakash C Sanyal

- 1-मैं Rishin भट्टा नाम महावात महा + मय्या 2
- 2-मैं अपना भट्टा 2992 इतने वर्षों से गांव वसिह जिला झज्जर
-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 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 रिकॉर्डिंग रे रखी हैं ।
- 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 हैं तथा इसमें कुछ भी छुपाया नहीं गया हैं ।

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 राजू भट्टा नाम शिवजी मालिक

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

3033

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)



13622

05/08/2024

RAKESH KUMAR
Stamp Vendor
Bahadurgarh

Dindar Singh Bhagwan Singh & others
Ramprasad

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 ।



[Signature]
शपथकर्ता / भट्टा मालिक

तसदीक 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

[Signature]
शपथकर्ता / भट्टा मालिक

ATTESTED
[Signature] 5/8/24
Mukesh Kumar Saini
Advocate & Notary
Bahadurgarh, Jhajar (HR)



RAKESH KUMAR
Stamp Vendor
Bahadurgarh

13627

05/08/2024

Shankar Bhattar CV

1-मैं अनुराधा कुमार भट्टा नाम शंकरभट्टा क. राम

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 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।

शपथकर्ता/भट्टा मालिक



सही सही सही:- 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
Advocate & Notary
Bahadurgarh, Jhajar (HR)

शपथ-पत्र

- 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 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 ।



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

ATTESSED
Mukesh Kumar Saini

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

IN THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 480 OF 2024

VAKALATNAMA

IN THE MATTER OF :

MR. VINAY CHHILLAR & ANOTHER

...Applicants

Versus

HARYANA STATE POLLUTION CONTROL BOARD & ORS.

...Respondents

KNOW ALL to whom these present shall come that I/We SUMAN BHATTA @ DABAS BHATTA the above named Respondent No. 16 do hereby appoint SHRE 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

Ishya Dabas
Applicant/ Respondent
(Respondent No. 16)
Suman Bhatta @ Dabas 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 : 06.2025



Yours Sincerely,

(GAURAV AGARWAL)
Advocate