

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

O.A. No.374 of 2022

IN THE MATTER OF:-

Green Earth

.....Applicant

Versus

Dy. Commissioner, Kuruksheira &Ors.

....Respondents

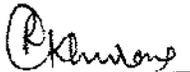
INDEX

S. No.	Particulars	Pg. No.
1.	Reply on behalf of Respondent Nos.1 to 4 alongwith supporting affidavit.	1-13
2.	<u>ANNEXURE-R/1.</u> A list of 188 standing trees.	14-18

3. Vakalatnama 19

Place:

Date: 27.06.2022


Rahul Khurana,
(Advocate)

THROUGH

(ANIL GROVER)
Sr. Additional Advocate General,
Haryana, A-174, Second Floor,
Defense Colony, New Delhi-110024
groveradvocate@rediffmail.com
M: 9811894060

BEFORE THE HONBLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

O.A. No.374 of 2022

IN THE MATTER OF:-

Green Earth

...Applicant

Versus

Dy. Commissioner, Kurukshetra &Ors.

... Respondents

REPLY ON BEHALF OF RESPONDENT NOS.1 TO 4.

MOST RESPECTFULLY SHOWETH:-

- I. That present reply is being filed through Sh. Chander Kant Kataria, HCS, Chief Executive Officer, Kurukshetra Development Board, Braham Sarovar, Kurukshetra, Haryana, who being very well conversant with the facts and circumstances of the present case, is being authorized to file the present reply on behalf of answering Respondents 1 to 4.

It is humbly submitted that Kurukshetra Development Board (hereinafter referred as to 'KDB') is an autonomous body for taking steps for overall development and also to make provisions for facilities for pilgrims and tourist.

- II. That to save and except, what is specifically admitted hereunder, each and every averment, submission, allegation and contention of the Applicant, raised in the Original Application, which is not specifically admitted herein and

which are inconsistent with the tenor of the present reply may be treated as specifically denied and not admitted by the answering respondent Nos.1 to 4.

- III. That the present reply is being filed dealing with the concerning issues and submitting relevant facts. However, liberty is being craved to file additional reply/affidavit as and when need arises, before this Hon'ble Tribunal.

PRELIMINARY SUBMISSIONS & OBJECTIONS:-

1. That the applicant approached this Hon'ble Tribunal with incorrect facts and obtained interim injunction order dated 25.05.2022 against felling of trees by misleading this Hon'ble Tribunal about actual number of trees to be felled and their actual status. It is humbly submitted that applicant has obtained interim stay order dated 25.05.2022 on felling of trees, without compliance of provisions enumerated in Section 19 (4) (i) of the National Green Tribunal Act, 2010 which provides that interim order (including granting an injunction or stay) can be passed after providing the parties concerned an opportunity to be heard, on any application made or appeal filed under this Act. However, in the present case no opportunity to be heard was granted before passing the interim order dated 25.05.2022.
2. That the present application has been filed alleging that 24 green trees are to be felled with sinister motive in Jyotiser Tirth, Kurukshetra, Haryana which is totally unreasonable.

The allegations made by the applicant are baseless, incorrect and thus liable to be dismissed.

3. That the applicant Green Earth has no cause of action and locus standi to file and maintain the present false application against the answering respondents. This O.A. has been filed just with malafide intention and to cause undue interruption in the projected work. Otherwise, the applicant is very well aware that the answering respondents are not going to do any kind of illegal act rather-working within the ambit of prevailing law.

4. That it is most humbly submitted that the exact number of trees required to be felled, their actual status and prevailing circumstances for such felling is as under:

(a) That in the year 2016, Development of Tourism Infrastructure at places related to Mahabharata in Kurukshetra including "Jyotisar Tirth, Jyotisar, Kurukshetra" under Krishna Circuit Phase-I of Swadesh Darshan Scheme was sanctioned. The whole project consisting of following components:-

- i. Braham Sarover (3831 Lakhs)
- ii. Jyotisar (3233.88 Lakh)
- iii. Narkatari (212.96 Lakh)
- iv. SanhitSarover (545.59 Lakhs)
- v. City Infrastructure (491.22 Lakhs)

As per said scheme Jyotisar is one of the components, which is being developed under the Krishna Circuit Phase-I of Swadesh Darshan Scheme. Besides sanctioned budget by Ministry of Tourism, Govt of India, the State Government Haryana has sanctioned 1661 Lakhs for construction of Mahabharata theme building components in Jyotisar. Jyotisar is situated on Kurukshetra-Pehowa Road. Lord Krishna is believed to have delivered his message of the Bhagvadgita to Arjuna in Mahabharata at this place.

For an immense experience of the site, the magnificent statue of Virat Swaroop of Lord Krishna, 50 ft. high has been erected.

- (b). That as the Kurukshetra Development Board has to make provisions for facilities for pilgrims and tourist taking care of all aspects including environment and sentiments of devotees, it constituted Committee under the directions of Deputy Commissioner, Kurukshetra consisting of District Forest Officer, Kurukshetra, District Horticulture Officer, Kurukshetra and the Estate Manager, Kurukshetra Development Board, Kurukshetra.

Keeping Environment Ecology, sanctity and historical importance of Holy place under consideration, a report of trees which are standing has been prepared and 188 trees are found standing with full growth and

greenery. A list of 188 standing trees is annexed herewith and marked as ANNEXURE-R/1. It has been observed by the Committee that out of these 188 trees, 7 trees are creating hindrance to clear & proper visibility of the Statue. The details of those trees is given below:

Sr. No.	Garth (Cm)	Species	Remarks
1.	89	Siras	D.Dry
2.	158	Arjun	Green
3.	210	Siras	Green
4.	197	Siras	Green
5.	188	Siras	Green
6.	185	Arjun	Green
7.	118	Siras	D.Dry

(c). That out of these 7 trees, two trees are dead dry and five trees are found to be green by the Committee out of which 3 of species of Siras and 2 of Arjun. It has also been decided that 70 trees of the same nature species shall be planted in the areas as per compensatory afforestation. It is worthwhile to mention here that compensatory afforestation has been commenced and 15 number of plants have been planted by the KDB in the vicinity of the Jyotisar.

5. That in order to ensure that devotees may have benefited of clear and magnificent visibility of 'Virat Roop Statue of Lord Krishna', these 7 trees are required to be felled. It is necessary to cut the aforesaid 7 trees in order to complete

AB

the said projected work. Except these 7 trees, the respondents are not going to cut any more tree.

It is humbly submitted that 70 number of trees are planned to be planted. Full attention and care shall be taken on survival of new planted trees. It is worthwhile to mention here that compensatory afforestation has been commenced and 15 number of plants have been planted by the KDB in the vicinity of the Jyotisar. Further afforestation shall be completed in Monsoon.

6. That present original application has been filed with malafide intention. There are many trees in the vicinity but in this big project neither any trees have been cut nor any other trees (Except-7) are required to be cut. The department has taken care of the trees/environment. It is humbly submitted that present OA does not involve substantial question of Environment.
7. That the applicant is estopped from filing and maintaining the present false and frivolous O.A. before this Hon'ble Tribunal. The O.A. filed with misrepresentation and concealment of above narrated true facts is legally not maintainable and liable to be dismissed with costs.

AS

REPLY ON MERITS:-

1. That the contents of Para No.1 of this application are denied except those are matter of record. The applicant be put to strict proof of the same.
2. That the contents of Para No.2 of this application alleged to be filed for protection of 24 trees, are incorrect and denied. It is submitted that the answering respondents are not going to do any kind of illegal and violative act rather answering respondents are going to complete the Development of Tourism Infrastructure at places related to Mahabharata in Kurukshetra including "Jyotisar Tirth, Jyotisar, Kurukshetra" under Krishna Circuit Phase-I of Swadesh Darshan Scheme sanctioned in the year 2016 and that projected worked will definitely increase the importance of the said place at International level. The contents of preliminary submissions & objections may kindly be treated as part and parcel of the present para as those are not being repeated herein for the sake of brevity.
3. That the contents of Para No.3 are totally wrong, incorrect and denied. The contents of preliminary submissions & objections may kindly be treated as part and parcel of the present para as those are not being repeated herein for the sake of brevity. There are many trees in the vicinity but in this big project neither any trees have been cut nor any other trees (Except-7) are required to be cut. The department has taken care of the trees/environment. Otherwise, there is no

NA

imbalance eco-system as alleged by the petitioner. The answering respondents are going to plant the above-scheduled 70 trees very soon at appropriate place in lieu of cutting of aforesaid 7 trees.

4. That the contents of Para No.4 are totally wrong, incorrect and denied. The contents of preliminary submissions & objections may kindly be treated as part and parcel of the present para as those are not being repeated herein for the sake of brevity. It is submitted that no such incident has ever been taken place on 14.04.2022 as alleged in this para by the applicant rather in compliance with the directions given by the Deputy Commissioner, Kurukshetra a committee constituted for this purpose inspected the site of Virat Roop Statue of Lord Krishna at Jyotisar on the date 12.04.2022 and submitted the report dated 12.04.2022 informing that a Virat Roop Statue of Shree Krishna has been erected but trees standing around the Statue are creating hindrance to visibility of the statue, so in order to avoid the said hindrance to glorious visibility of the statue, 7 trees narrated above needs to be removed.

The land on which the trees in question are standing does not belong to Forest Department and land does not fall under any Notification issued by the Forest Department. However, it has been provisioned to plant the ten times, i.e. 7x10 trees of Native species in this area as a compensatory afforestation. Full attention and care shall be taken on

AK

survival of new planted trees. It is worthwhile to mention here that compensatory afforestation has been commenced and 15 number of plants have been planted by the KDB in the vicinity of the Jyotisar. Further afforestation shall be completed in Monsoon.

5. That the contents of Para No.5 of the original application are denied except those are matter of record. It is submitted that order dated 21.07.2015 in OA No. 167 of 2015 is not applicable to the facts of this case. Nevertheless, it is also submitted that nothing has been done contrary to any order passed by this Hon'ble Tribunal. The proper safeguards are being taken to ensure protection of standing trees in accordance with directions issued by this Tribunal in O.A. No.167/2015 titled as *Indian Council for Enviro-legal Action Vs. Deputy Commissioner and another.*

It is humbly submitted that the requisite afforestation of 70 plants is provisioned in lieu of 7 trees. It is worthwhile to mention here that compensatory afforestation has been commenced and 15 number of plants have been planted by the KDB in the vicinity of the Jyotisar. Further afforestation shall be completed in Monsoon.

6. That the contents of Para No.6 of the original application are denied except those are matter of record. The contents of preliminary submissions & objections may kindly be treated

as part and parcel of the present para as those are not being repeated herein for the sake of brevity.

7. That the contents of Para No.7 of the original application are denied except those are matter of record. However, the answering respondents are ready and planned to plant the ten times, i.e. 7x10 trees of Native species in this area as a compensatory afforestation. 15 number of plants have already been planted by the KDB in the vicinity of the Jyotisar. Further afforestation shall be completed in Monsoon.
8. That the contents of Para No.8 of the original application are wrong, incorrect and vehemently denied. No such illegal activities regarding of removal of trees were ever carried out by any of the respondents as alleged in this para. No permission of cutting of trees have been given mechanically as alleged. All judicially orders have been complied with earnestly. Trees are being protected. In terms of letter bearing No.378 dated 21.08.2020 issued by the Kurukshetra Development Board to the Forest Division Officer (Territorial), Kurukshetra, around 1000 shady trees were planted by Private NGO's along with Forest department & Kurukshetra Development Board. At the board level also in the year 2021, about 2400 ornamental trees have been planted on the land falling under it.

AB

9. That in reply to the contents of Para No.9 of the Original application, the contents of preliminary submissions & objections are being reiterated. It is humbly submitted that plantation of 7 x10 trees will be done as compensatory afforestation. 15 number of plants have already been planted by the KDB in the vicinity of the Jyotisar. Further afforestation shall be completed in Monsoon.

REPLY to the grounds:-

The grounds raised in OA are baseless, irrelevant, misconceived and thus liable to be rejected. The contents of preliminary submissions & objections may kindly be treated as part and parcel of the present para as those are not being repeated herein for the sake of brevity. It is humbly submitted that no ground is made out to file the present OA.

10. That the contents of limitation para are totally wrong and denied. The original application in hand is barred by law and hence is liable to be dismissed.

Reply to Prayer Clause:

In order to increase the importance of Jyotisar Tirth, Kurukshetra at International level, the cutting of 7 trees narrated above is necessary as these trees are creating hindrance/ interruption in completion of Development of Tourism Infrastructure at "Jyotisar Tirth, Jyotisar, Kurukshetra" under Krishna Circuit Phase-I of Swadesh Darshan Scheme.

AS

It is therefore, most respectfully prayed that in view of aforesaid facts and circumstances, the present original application filed by the Applicant may kindly be dismissed with costs, in the interest of justice, equity and fair play.

Place:

Dated: 27.06.2022


Chief Executive Officer,
Kurukshetra Development Board,
(for Respondent Nos. 1 to 4)



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

O.A. No.374 of 2022

IN THE MATTER OF:-

Green Earth

.....Applicant

Versus

Dy. Commissioner, Kurukshetra &Ors.

...Respondents

AFFIDAVIT

I, Chander Kant Kataria, HCS, Chief Executive Officer, Kurukshetra Development Board (KDB), Braham Sarovar, Kurukshetra, Haryana, do hereby solemnly affirm and declare as under:

1. That I am the authorized representative of the Respondents in the aforesaid matter. I have gone through the records of the Respondents Department. I have made myself conversant with the facts of the present case and therefore, I am competent to depose this affidavit.
2. That the accompanying reply has been drafted under my instructions. I have read the contents thereof, the same are true and correct and may kindly be read as part of this affidavit as the same are not being repeated herein for the sake of brevity.



VERIFICATION:-

Verified at Kurukshetra on this 27th day of June, 2022 that the contents of above affidavit are true and correct to my knowledge derived from the official records of the Respondents. No part of it is incorrect and nothing material has been concealed therefrom.

ATTESTED
Navin Singh Adv
DISTRICT NOTARY
KURUKSHETRA

27 JUN 2022

Identified by *g/cand*
Certified that above was declare
on solemn affirmation before me
at Kurukshetra by the deponent
ATTESTED
NOTARY KURUKSHETRA

Chander Kant Kataria
DEPONENT
Chief Executive Officer
Kurukshetra Development Board
KURUKSHETRA

Chander Kant Kataria
DEPONENT
Chief Executive Officer
Kurukshetra Development Board
KURUKSHETRA

Annexure – R/1

Sr. No.	Name of the Tree	Place	Age
1	Palm	Main way to Light & Sound Show	22 Year
2	Palm	--do--	22 Year
3	Palm	--do--	22 Year
4	Palm	--do--	22 Year
5	Palm	--do--	22 Year
6	Palm	--do--	22 Year
7	Palm	--do--	22 Year
8	Palm	--do--	22 Year
9	Palm	--do--	22 Year
10	Palm	--do--	22 Year
11	Palm	--do--	22 Year
12	Palm	--do--	22 Year
13	Palm	--do--	22 Year
14	Palm	--do--	22 Year
15	Jamun	--do--	20 Year
16	Pipal	--do--	50 Year
17	Kadam	Back Side of Toilet Block	18 Year
18	Kadam	--do--	18 Year
19	Ashoka	--do--	18 Year
20	Kadam	--do--	18 Year
21	Kadam	--do--	18 Year
22	Kadam	--do--	18 Year
23	Banyan	--do--	20 Year
24	Faiwash	--do--	20 Year
25	Ashoka	--do--	20 Year
26	Kaner	--do--	20 Year
27	Shtut	In front of Toilet Block	5 Year
28	Kushum	--do--	20 Year
29	Kushum	--do--	12 Year
30	Pine	--do--	12 Year
31	Pine	--do--	12 Year
32	Pine	--do--	12 Year
33	Pine	--do--	12 Year
34	Pine	--do--	12 Year
35	Pine	--do--	12 Year
36	Kadam	Main Entrance Road	5 Year
37	Kadam	--do--	5 Year
38	Kadam	--do--	5 Year
39	Kadam	--do--	5 Year
40	Kadam	--do--	5 Year
41	Kadam	--do--	5 Year
42	Kadam	--do--	5 Year
43	Kadam	--do--	5 Year

AS

Sr. No.	Name of the Tree	Place	Age
44	Kadam	--do--	5 Year
45	Kadam	--do--	5 Year
46	Kadam	--do--	5 Year
47	Kadam	--do--	5 Year
48	Kadam	--do--	5 Year
49	Aloe Stones	--do--	5 Year
50	Kadam	--do--	5 Year
51	Kadam	--do--	5 Year
52	Amaltash	--do--	5 Year
53	Kadam	--do--	5 Year
54	Kadam	--do--	5 Year
55	Kadam	--do--	5 Year
56	Aloe Stone	--do--	5 Year
57	Kadam	Vita Booth to Pehowa Road	5 Year
58	Gulmohar	--do--	12 Year
59	Faiwash	--do--	12 Year
60	Deck	--do--	12 Year
61	Deck	--do--	12 Year
62	Gulmohar (Dead Dry)	--do--	12 Year
63	Gulmohar	--do--	12 Year
64	Gulmohar	--do--	12 Year
65	Gulmohar	--do--	12 Year
66	Morsari	--do--	5 Year
67	Morsari	--do--	5 Year
68	Ashoka	Main Gate to Virat Sawroop	20Year
69	Banyan Tree	--do--	Mahabharta Period
70	Banyan Tree	--do--	Mahabharta Period
71	Banyan Tree	--do--	Mahabharta Period
72	Morsari	--do--	15 Year
73	Morsari	--do--	15 Year
74	Morsari	--do--	15 Year
75	Morsari	--do--	15 Year
76	Kanak Champa	--do--	10 Year
77	Kanak Champa	--do--	10 Year
78	Deck	--do--	
79	Kanak Champa	--do--	
80	Champa	--do--	
81	Ficus Tree	--do--	20 Year
82	Jamun	--do--	25 Year
83	Eucilptus	--do--	
84	Banyan Tree	--do--	Mahabhart Period

A2

Sr. No.	Name of the Tree	Place	Age
85	Carrot	--do--	25 Year
86	Banyan Tree	--do--	Mahabhart Period
87	Banyan Tree	--do--	Mahabhart Period
88	Ficus Tree	--do--	10 Year
89	Palm Kheera	--do--	35 Year
90	Ashoka	--do--	35 Year
91	Ashoka	--do--	30 Year
92	Ashoka	--do--	30 Year
93	Arjun	--do--	30 Year
94	Siras	--do--	30 Year
95	Siras	--do--	30 Year
96	Arjun	--do--	30 Year
97	Arjun	--do--	12 Year
98	Arjun	--do--	12 Year
99	Arjun	--do--	12 Year
100	Arjun	--do--	30 Year
101	Arjun	--do--	30 Year
102	Siras	--do--	15 Year
103	Pine Tree	--do--	30 Year
104	Arjun	--do--	30 Year
105	Arjun	--do--	30 Year
106	Siras	--do--	30 Year
107	Neem	--do--	30 Year
108	Siras (Dead Dry)	--do--	30 Year
109	Gulmohar	--do--	30 Year
110	Gulmohar	Near Main Gate	30 Year
111	Banyan Tree	--do--	30 Year
112	Arjun	--do--	30 Year
113	Arjun	--do--	30 Year
114	Arjun	--do--	30 Year
115	Gulmohar	--do--	30 Year
116	Siras	--do--	30 Year
117	Dead Dry	--do--	30 Year
118	Belpathar	--do--	10 Year
119	Kachnar	--do--	15Year
120	Ashoka Tree	--do--	03 Year
121	Ashoka Tree	Back Side of shopping Complex	15 Year
122	Ashoka Tree	--do--	15 Year
123	Ashoka Tree	--do--	15 Year
124	Ashoka Tree	--do--	15 Year
125	Ashoka Tree	--do--	15 Year
126	Kadam	--do--	15 Year
127	Ashoka Tree	--do--	15 Year
128	Kadam	--do--	15 Year

Sr. No.	Name of the Tree	Place	Age
129	Kadam	--do--	15 Year
130	Ashoka Tree	--do--	15 Year
131	Ashoka Tree	--do--	15 Year
132	Neem	--do--	15 Year
133	Ashoka Tree	--do--	15 Year
134	Ashoka Tree	--do--	15 Year
135	Ashoka Tree	--do--	15 Year
136	Eucalypts	--do--	15 Year
137	Jamun	--do--	20 Year
138	Kusun	--do--	10 Year
139	Jamun	--do--	20 Year
140	Kusum	--do--	10 Year
141	Ashoka	Pehowa Road near Gril & Lake	15 Year
142	Dead Dry	--do--	
143	Kadam	--do--	20 Year
144	Kadam	--do--	20 Year
145	Kadam	--do--	20 Year
146	Kadam	--do--	20 Year
147	Kadam	--do--	20 Year
148	Papri	--do--	20 Year
149	Papri	--do--	20 Year
150	Papri	--do--	20 Year
151	Papri	--do--	20 Year
152	Papri	--do--	20 Year
153	Papri	--do--	20 Year
154	Siras	-do-	20 Year
155	Kadam	--do-	20 Year
156	Kadam	--do-	20 Year
157	Kadam	--do-	20 Year
158	Siras	--do-	20 Year
159	Papri	--do-	20 Year
160	AloStoniya	--d0-	20 Year
161	Siras	--do-	20 Year
162	Papri	--do-	20 Year
163	Siras	--do-	20 Year
164	Siras	--do-	20 Year
165	Siras	--do--	20 Year
166	Siras	--do-	20 Year
167	Siras	--do--	20 Year
168	Morsari	--do--	15 Year
169	Amaltash	--do--	15 Year
170	Amaltash	--do-	15 Year
171	Pine Tree	--do--	15 Year
172	Pine Tree	--do--	15 Year
173	Pine Tree	--do--	15 Year
174	Pine Tree	--do--	15 Year

AB

Sr. No.	Name of the Tree	Place	Age
175	Pine Tree	--do--	15 Year
176	Pine Tree	--do--	15 Year
177	Pine Tree	--do--	15 Year
178	Pine Tree	--do--	15 Year
179	Pine Tree	--do--	15 Year
180	Pine Tree	--do--	15 Year
181	Pine Tree	--do--	15 Year
182	Pine Tree	--do--	15 Year
183	Ficus Tree	--do--	15 Year
184	Shisham	--do	15 Year
185	Papri	--do--	15 Year
186	Papri	--do--	15 Year
187	Amaltash	--do--	15 Year
188	Jamun	--do--	15 Year

AB

VAKALATNAMA

BEFORE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI

Appeal No./Original Application No. 374 of 2022

In re:-

Green Earth Applicant

VERSUS

By Commissioner, Kurukshetra & Ors. Respondent

KNOW ALL to whom these present shall come that I/We Chander Kant Kataria, CEO, Kurukshetra the above named authorized representative of R-1 to 4 do hereby appoint

**ANIL GROVER, Sr. Additional Advocate General, Haryana
Rahul Khurana, Advocate
A-174, 2nd Floor, Defence Colony, New Delhi-110024
PH.:011-40507217, 41657217**

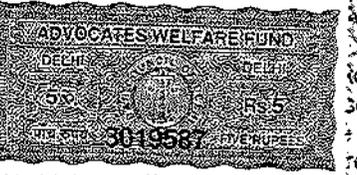
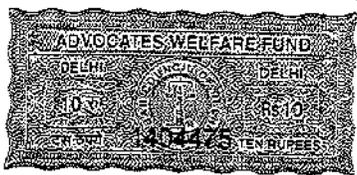
(herein after called the advocate/s) to be my/our Advocate in the above-noted case authorized him:-

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 executive on review, revision, withdrawal, compromise or other petitions or affidavits of 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 including original 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.



proceedings, and receive money, cheques, cash and grant receipts thereof and things which may be necessary to be done for the progress and in the of the said case.

instruct any other Legal Practitioner, authorising him to exercise the by conferred upon the Advocate whenever he may think fit to do so by confered upon the Power of Attorney on our behalf.

to ratify and confirm all acts done by the as if done by me/us to all intents

erised agent would appear in the rance when the case is called. d the advocate or his substitute t costs whenever ordered by the ain himself.

in the event of the whole or part of the to be paid to the advocate remaining unpaid he shall be entitled to ecution of the said case until the same is paid up. The fee settled is and above Court. I/we hereby agree that once the fee is paid. I/we will refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee equivalent to half of the agreed fee for every addition three years, or part thereof.

IN WITNESS WHEREOF I/we do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this

27th day of June 2022

Accepted subject to the terms of fees.

Advocate

[Signature]

Client

[Signature]

Chief Executive Officer
Kurukshetra Development Board
KURUKSHETRA

R. Khurana
9/2183/08