

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

OA NO. 1068/2024

**IN THE MATTER OF:-**

**MR. JATINDER SETHI & ORS.**

...APPLICANTS

**VERSUS**

**UNION OF INDIA & ORS.**

...RESPONDENTS

**INDEX**

NDOH: 03.12.2024

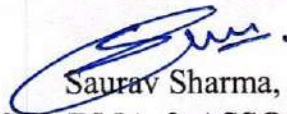
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Place: New Delhi

Filed by:

Dated: 27-11-2024

Advocates for the Petitioner



Saurav Sharma, Advocate

**SAURAV SHARMA & ASSOCIATES,**

Lawyers & Solicitors

Off at: T-303, Adore Exclusive,

Sector-86, Gr. Faridabad, Haryana-121006

Email ID: stalwartprofessionals@gmail.com

Mobile No. 9999046369

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**REPLY BY WAY OF AFFIDAVIT BY NAMED ANSWERING  
RESPONDENT ARRAYED AMONG THE UNKNOWN AS  
RESPONDENT NO. 7)**

I Avtar Singh Bhadana S/o Sh. Nahar Singh R/o Village Anangpur,  
Tehsil & District Faridabad have read and understood the contents of the  
application and having gone through the records of the application and do  
hereby solemnly affirm and state as under:

**Preliminary Submissions:-**

1. That my name arrayed amongst the unknowns as respondent no. 7, in  
the aforesaid application and to say that the answering respondent has  
read and understood the contents mentioned in the said application



filed and under consideration before this Hon'ble Tribunal and in reply thereto at the very outset denies each and every allegation made in the application against answering respondent.

2. That the answering respondent herein also reserves his right to file a further reply at a later date with the permission of this Hon'ble Tribunal, if necessary along with all necessary documents and proofs of innocence in this matter.
3. That prior to providing a paragraph-wise response to the application, the respondent would like to make the following preliminary submissions, which would set out the facts and legal propositions averred in the application in the correct prospective.
4. That the answering respondent, at the very outset submits that the submissions /contents of the application made by the applicant holds no merit inasmuch they are completely misplaced on facts and the material available on records. In this pretext, the following facts become more important.



5. That the applicants erred while implicating the answering respondent in the present application as the answering respondent is a person of repute and also a well-known leader and an ex- Member of Parliament. From the contents of the application, it is evident that the applicants have no information with respect to persons indulged into alleged activities as stated by the applicants and no reason cited to justify service of present application to the answering respondent. In contrary, the answering respondent falsely arrayed as respondent No, 7 in the present application amongst the unknown persons, with ill will and political motivation and there is nothing put on record by the applicants in their application, which substantiate or support the allegations levied against the answering respondent.
6. That the answering respondent has no concern or any nexus with the “activities” as mentioned in the application of the applicants. It is pertinent to mention that the applicant raised substantial questions relating to environment and more particularly on issue of “continuous degradation of environment on the “Subject Land” (well-recognized forest area/notified under section 4 and 5 of the Punjab Land Preservation Act, 1900) due to non-forest activities (i.e. illegal storage of sand, concrete stone, etc., unloading and loading, sale, grinding,



creating of quartzite stone) by various unknown persons arrayed as respondent no. 7. It is crystal clear from content of the application that the applicants have no information that who is in possession with respect to unknown person alleged to be involved in the alleged activities and that the applicants has not furnished any document or substantial evidence on record to establish that why “Mr. Avtar Singh Bhadana”, the answering respondent has implicated amongst the unknown persons as respondent no. 7. Thus, the application has no merits and is liable to dismissed for non-joinder and mis-joinder of the necessary parties.

7. That it is settled proposition of law that mere false & vague allegation shall not take place as foundation to array a person in a complaint and to misuse the fundamental rights conferred upon the applicants to enforce their legal rights. However, in the present application, it is clearly evident that the applicants abused the process of law for their own satisfaction and dragged an innocent person for their own reasons known to themselves without appreciating any substantial evidence/documentary proof on record to implicate the name of answering/respondent “Mr. Avtar Singh Bhadana” amongst the



unknown respondent no. 7 for involvement in the alleged activities and that even against whom, the applicants has no information to implead.

8. That the applicants raised substantial questions relating to environment on issue of “continuous degradation of environment on the **“Subject Land”**”. While elaborating the subject land, applicants used definition at their own convenience and took reference of area notified by special orders passed u/s 4 & 5 of the Punjab Land Preservation Act, 1900”. It is pertinent to submit that the name of Mr. Avtar Singh Bhadana is being dragged in the present application merely on suspicion and no concern with specific “subject land” referred by the applicant. The land pertains to the answering respondent is a vacant land and the answering respondent has no nexus with activities on subject land referred by the applicants nor any land belongs to answering respondent used or given to anyone on lease nor any alleged material at such land belongs to the answering respondent. Further, respondent no. 1 to 6 are under absolute authority to investigate on alleged activities referred by the applicants and to take legal necessary action against the persons who found culprits in the said matter as such the answering respondent has no concern with



alleged activities nor with alleged unknown persons and that the answering respondent has no disquiet even if any action /enquiry initiated as per law against the alleged unknowns for the alleged activities, the answering respondent has no objection at all.

9. That the applicants taken the reference of subject land under two different pretext. The first where reference made by the applicants for 20-25 acres of subject land and on other with khasra no. 1387. It is pertinent to submit that applicants lacked with complete information before appreciating this Hon'ble Tribunal for arraying the answering respondent in the present application. Further, applicants has not came with any admissible document or with any cogent evidence to quote which part of "subject land" is using by the answering respondent for alleged activities, hence arraying the answering respondent as party in the present application is clear abuse of process of law and rights conferred to the applicants and the name of answering respondent conspired by the applicants with unknown persons without any substantial records and with ill will political intentions to tarnish the image of the answering/respondent in the society. In fact the Respondent No. 1 to 6 are under absolute authority to prevent any illegal activity if being done by any of the person and to examine the



authenticity and concern raised by the applicants as such the answering respondent has no concern with alleged activities on subject land, which adjoins the land of answering respondent.

10. That the answering respondent also requested with the local authorities for removal of the same however, no action has been taken so far on such request, which is a matter of concern but the answering respondent should not be held liable for activities carrying out by some unknowns and the answering respondent should not be implicated merely on the basis of suspicion or for the reasons that the said activities being carrying out on the "subject land".
  
11. That the answering respondent is not indulged into any alleged activities and that the applicants also filed present application against unknown person. The present original application is not maintainable against the answering respondent as the subject matter is not relates to the answering respondent. The issue pertaining to degradation of Aravalli Hills already decided by the Hon'ble Apex Court in its different decisions. The investigation into the alleged activities as cited by the applicants are now within the jurisdiction of the respondent no. 1 to 6, which yet to be invoked and if any fundamental

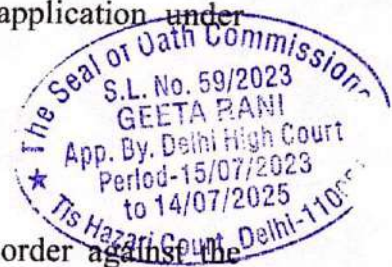


rights of the applicants are superseded, the appropriate forum may decide the subject matter.

12. That the answering respondent arrayed as party in the present application merely on suspicion and for being a person of repute. The applicants are also living within locality and nearby land mentioned by the applicants and if the definition of subject land is consider in accordance with the applicant, the land of the applicants was also part of the notified land, which after certain approvals are now declared as residential colony/society and if, the answering respondent arrayed as respondent merely for having coparceners rights in any piece of land adjacent to subject land then such rule also apply on applicants, while determining the interested /alleged person who should be held liable for the activities. Thus, the contention of applicants is not substantial, while arraying answering respondent as respondent no. 7 for all such alleged activities and the present application filed by the applicants is nothing but just an act to mobile the political structure of the answering respondent and to shatter the image of answering respondent in the society.



13. That the present Original Application is also not maintainable for the reasons that the applicants taken the reference of area "subject land" pursuant to Notification issued pursuant to special orders passed u/s 4 & 5 of the Punjab Land Preservation Act, 1900, wherein subject land notified as forest land and prohibited non-forest activities for 30 years from the date of publication of the Notification i.e. 18.04.1992. The said period is elapsed on in the Month of April, 2024. Hence, the subject land and its preservation is required to be reconsider by the respondent no. 1 to 6, which is not subject matter of the application under consideration with this Hon'ble Tribunal.
14. That the present original application is also not maintainable against the answering respondent for the reasons that no cause action arise pursuant to any act or commission of the answering respondent against the applicants and the applicants has no locus standi to file and array the answering respondent in the present application under consideration before this Hon'ble Tribunal.
15. That the present original application seeking an order against the unknowns impleaded as Respondent No. 7 with whom the answering respondent has no concern. The respondent no. 1 to 6 are under



absolute authority to conduct and verify the veracity of the complaint and the alleged activities quoted by the applicant but in the instant case, the application of the applicant is not maintainable being barred by limitation. Section 14(3) of the NGT Act clearly provides that **“no application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute first arose”**. The language of the provision suggests concept of continuing cause of action as the legislature in its wisdom has provided an outer limit of six months from the cause of action arising first. Hence, on bare perusal of dates in the application, the cause of action first arose after the notification came into existence, secondly the day one, when such alleged activities commenced in the vicinity of the applicants and even if, the complaints considered as genuine, the last complaint is dated 22.07.2022, but the present original application filed with this Hon'ble Tribunal on 25.07.2024, which questions the integrity and motive of the applicants behind filing the present complaint. Hence, the original Application is beyond limitation and not maintainable for this reason also.



In Windsor Realty Pvt. Ltd .v. Secretary MOEF, W.P. No. 594 of 2015, decided on 09.06.2016 the High Court of Judicature at Bombay has held that the concept of continuous cause of action is alien to this Tribunal. The High Court has held that:

*“35. A bare perusal of the said section clearly discloses that period of limitation is six months from the date on which the cause of action first arose. Prima faice, therefore it cannot be interpreted by any stretch of imagination that it would arise from the date of knowledge of the original applicant of the alleged violation taking place or from the date on which the Environmental Authorities were informed about violation and inaction on their part. There appears to be a lot of confusion in the mind of NGT Bench, Pune on various aspects of continuous cause of action. Perusal of the said Section indicates that the concept of continuous cause of action cannot apply to the complaints which are filed before the NGT because had it been so, the legislature would not have stated that the limitation would be six months from the date on which the cause of action for such dispute first arose. If the interpretation which is sought to be given to the provision by the NGT Bench, Pune in the impugned order is*



*accepted, the complaint could be filed by the aggrieved person at any point of time, claiming that he came to know about the violation after 10 or 20 years. At the same time, if there is any violation of the provisions of the Environment (Protection) Act, 1986, the same have to be addressed and looked into. The only question is by which Authority.”*

16. That the present original application is not maintainable for the reasons that the applicants has not came with clean hands and not stated the true affair behind the present complaint. The subject matter was challenged before the Hon'ble Apex Court and the applicants cited the same for reference of this Hon'ble Tribunal as well. Thus, implication of the said orders are within the ambit of the respondent no.1 to 6 and if, the applicants has any grievance, alternative statutory mechanism is in place, which may invoke by applicants against the respondent no. 1 to 6 but applicants, arrayed the answering respondent amongst the unknowns for the reasons known to the applicants itself and thus, the application may be dismissed for the aforesaid reasons.
17. That the present Original Application is not maintainable for the reasons that the applicants has not came with clean hands and not



stated the true affair behind the present complaint. Submissions and contents of the application are different from relief sought by the applicants. Kind attention of this Hon'ble Tribunal is invited on section 14 of the NGT Act, 2010. Relevant extract of Section 14 –

*s.14 (1). The Tribunal shall have the jurisdiction over all civil cases where a substantial question relating to environment (including enforcement of any legal right relating to environment), is involved and such question arises out of the implementation of the enactments specified in Schedule I.*

Hence, as per s.14 of the act, Original Application shall be filed with this Hon'ble Tribunal where substantial question relating to environment (including enforcement of any legal right relating to environment), is involved and such question arises out of the implementation of the enactments specified in Schedule I but the application under consideration does involves such question and limited to targeting an individual by the applicants and the same is without any substantial piece of evidence, which may establish any nexus of the answering respondent with alleged activities.



18. That after perusal of the contents of the application, the answering respondent submits that the applicants raised substantial questions relating to environment and more particularly on issue of “continuous degradation of environment on the **“Subject Land”** (well-recognized forest area /notified under section 4 and 5 of the Punjab Land Preservation Act, 1900). It is alleged by the applicants that illegal activities & non forest activities as mentioned in the said notification is carrying out by the unknown person on the “subject land” comprising 20-25 acres but on other pretext, after perusal of the clause (b) of the prayer clause, the applicants, specifically prayed for “surprise inspection of khasra No. 1387”. The definition for “subject land” adopted & modified by the applicants as per their convenience and such interpretations are differ and contrary to contents mentioned in the application and the relief sought. Therefore, said contrary, questions the veracity of the complaint filed by the applicants.
19. That the Original Application is not maintainable for the relief claimed as such the applicants not came with clean hands and not stated the true affair behind the present complaint. Submissions and contents of the application are different and contrary to relief sought by the applicants. That this Hon’ble Tribunal under its original



jurisdiction has power to grant relief, compensation and restitution as provided under section 15 of the NGT Act 2010. The said power can be exercised, however, only in case of Appeal. But, the applicants has not placed any reason for grant of relief /compensation nor placed on record any medical documents / medical diagnosis of the applicants, which substantiate that medical illness is/was caused from alleged activities only and therefore, applicants are not entitled for relief and compensation as prayed other than for restitution of environment damages, if any caused from such alleged activities. Kind attention of this Hon'ble Tribunal is invited on section 15, 17 & 18 of the NGT Act, 2010.

20. That the applicants has no locus standi to file the present application and array the answering respondent as party in the present application for the reasons as aforesaid under preliminary objections also for the reason that no cause of action arose against applicants through act and commission of any deed by the answering respondent.
21. That it is, therefore, prayed that the present Original Application be dismissed for the reason aforementioned, i.e., being not maintainable having alternative remedy to the applicants.



**22. That the named answering respondent shall now set forth its paragraph wise reply to the contents of the application:**

- a.** That the contents of synopsis and list of dates of the applicants are denied in view of the preliminary submissions made above by the named answering respondent, except in so far they are matter of record.
- b.** That the contents of **Paragraph nos. 1 – 3** are factual in nature and merits no response inasmuch they are matter of record and which is not inconsistent with the preliminary submissions made above. However, the answering respondent submits that the Applicants are resident of the vicinity fall with the “subject land” referred under notifications and participating in environmental damages at adjacent land to the forest by way of continuous construction activities in the said locality, the same also be investigated.
- c.** That the contents of **Paragraph nos. 4** are disputed. The present original application is not maintainable for the reasons as stated in preliminary submissions by the answering respondent and that



the answering respondent has no concern with the alleged activities as mentioned by the applicant and answering respondent falsely being implicated amongst the unknown persons without any substantial piece of evidence placed on record by the applicants for array the named answering respondent.

- d. That the contents of **Paragraph nos. 5** are factual in nature and merits no response inasmuch they are matter of record and where not inconsistent with the preliminary submissions made above and needs no reply from the answering respondent as such the name of the deponent falsely implicated amongst the unknown respondents with whom the answering respondent has no concern. W.r.t. the Notification no. S.O. 104/P.A./1900/S.3/92, dated 18.08.1992 read with notification no. S.O. 59/PA-2/1900/S.3/92 dated 10.04.1992 under reference by the applicants for the alleged activities was came into effect from the year 1992 and prohibits the activities for a period of 30 years. Hence, it the subject matter of respondent no. 1 to 6 and hence, needs no reply from the answering respondent.



- e. That the contents of **Paragraph nos. 6** are disputed. It is humbly submitted that the answering respondent has no concern with the alleged activities as cited by the applicants on the subject land referred by the applicants and raised substantial question of environmental damages in the subject land of 20-25 acres nor any relation with the person associated in such alleged activities. The name of the answering respondent conspired with unknowns merely for the reason that the answering respondent is person of repute as a politician.
- f. That the contents of **Paragraph nos. 8.1 -- 8.3** of the facts in brief are factual in nature and merits no response inasmuch they are matter of record and which are not inconsistent with the preliminary submissions made above and need no reply from the answering respondent.
- g. That the contents of **Paragraph nos. 8.4** of the facts in brief is disputed and an ambiguous submission made by the applicants without any strong information in hand. It is pertinent to mention that the applicants are trying to establish nexus by elaborating and manipulating the definition of **“subject land”** to implicate the answering respondent in the present complaint, as such the



answering respondent having no concern with land on which alleged activities are carrying out and that the answering respondent has no concern with the material being dumped at subject land and that the answering respondent has also informed the local administration for removal of the material dumped at subject land but the applications are under consideration with the statutory authorities.

- h. That the contents of **Paragraph nos. 8.5 to 8.8** of the facts in brief are factual in nature and merits no response inasmuch they are matter of record and except which it is not inconsistent with the preliminary submissions made above and needs no reply from the answering respondent.
- i. That the contents of **Paragraph nos. 8.9** of the facts in brief is disputed and denied in toto. The answering respondent has no concern with the use of land 20-25 acres for alleged activities as such, the respondent has no nexus with unknowns, who are alleged to be indulged into such alleged activities and that the answering respondent arrayed as named respondent merely on suspicion and for being a person of repute. The respondent no. 1 to 6 are under absolute authority to investigate the concern of the



applicants and to identify the unknowns persons involved in alleged activities on which part of the subject land in khasra no. 1387. As per revenue records, answering respondent having coparcener rights in an ancestral land which is a vacant land and no such alleged activities are carrying out on such part of land belongs to answering respondent and that the answering respondent has no indulgence with the allegation and concern raised by the applicants in present application with respect to material dumped at subject land mentioned by the applicants.

- j. That the contents of **Paragraph nos. 8.10** of the facts in brief is disputed and denied in toto. The contents of the para under reference is a false and baseless as such the applicants are trying to associate answering respondent who have no nexus with alleged unknowns and with alleged activities as mentioned by the applicant.
- k. That the contents of **Paragraph nos. 8.11 to 8.27** of the facts in brief are factual in nature and merits no response inasmuch they are matter of record. The contents of same duly responded through preliminary submissions/objections by the answering



respondent made above and hence, needs no reply from the answering respondent for brevity of repetition.

- l.** That the contents of **Paragraph nos. 9(A) to 9(GG) of Grounds** is disputed and denied except the contents which are factual in nature and merits no response inasmuch they are matter of record. The contents of same duly responded through preliminary submissions/objections by the answering respondent made above in respect of maintainability of the present application and hence, needs no reply from the answering respondent for brevity of repetition.
- m.** The prayer of the Petitioner are denied in view of the foregoing paras up to extent which is applicable on the answering respondent and affects the legal right of the answering respondent.
- n.** That the answering Respondent submits that the present short reply is being filed with Preliminary Objection to the Original Application only. The answering Respondent reserves its right to file a detailed reply to the allegations of the Original Application



along with necessary documents if it may require in future, to protect the legal rights of the answering respondent.

**Prayer:**

In view of the facts and circumstances of this application, it is most respectfully prayed that this Hon'ble may graciously be pleased to-

1. Pass an order issuing directions to the applicant to remove the name of the answering respondent arrayed amongst the unknowns as Respondent No. 7 and/or;
2. Dismiss the application on account of being non maintainable in present form and for the reason of mis-joinder or non-joinder of proper parties, limitation, locus standi and/or;
3. Pass an order reserving right of the answering respondent to file a counter reply to defend the legal rights and interest of answering respondent, in future or in event of any adverse action taken by the applicants against the answering respondent.
4. To pass any such order(s) as it may deems fit as per the facts and circumstance of the present application.

Place: NEW DELHI

Date: 27-11-2024



Deponent



**Verification:**

27 NOV 2024

27 NOV 2024

Verified on this \_\_\_\_\_ date of November, 2024 that the contents of this affidavit are correct on the basis of records of the answering respondent and the legal advice received and believed to be true. Nothing material has been concealed or suppressed therefrom.

I identify the deponent who has signed in my presence

*[Handwritten Signature]*

Deponent



CERTIFIED THAT THE DEPONENT  
Shri/ Smt/Mr...  
S/o. W/o. D/o...  
27 NOV 2024  
27 NOV 2024  
Resided by Shri/Smt...  
he/she is presently residing at...  
No. Delhi on...  
The contents of the affidavit...  
been read & explained to him and...  
correct to his knowledge  
Avtar Singh B. Ladan  
S/o Nataraj Singh  
R/o Firdarbaad  
R/o Saurav Singh (30)  
Oath Commissioner  
New Delhi



25

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**...APPLICANTS**

**VERSUS**

**UNION OF INDIA & ORS.**

**...RESPONDENTS**

KNOW all to whom these presents shall come that I, Avtar Singh Bhadana, is answering respondent in the above-named matter do hereby appoint

**Mr. Saurav Sharma/Mr. Neeraj Kaushik/Mr. Daya Chand Dhanakr (hereinafter called the Advocates) to be my/ our Advocate (s) in the above-noted case and authorize them:**

To act, appear plead in the above-named case in this Hon'ble Tribunal or in any other Court in which the same may be tried or heard & also in the Appellate Court including High Court subject to the payment of Fees separately for each Court by me/us.

To sign, file, verify & present pleadings, replications, appeals, cross objections or petitions for executions, review, restoration, withdrawal, compromise or other Petitions, replies, objections 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 withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise during or in any manner relating to the said case.  
To take out execution proceedings.

To appoint & instruct any other Legal Practitioner authorizing him to exercise the power & authorities hereby conferred upon the Advocates whenever he may think fit to do so & to sign the power of attorney on my/our behalf.


And I/we the undersigned do hereby agree to ratify and confirm the act as is done by the Advocates or their substitutes in the manner as my/our own acts as if done by me/us to do for intents & purpose.

And I/We undertake that I/We or my/our authorized agent would appear in Tribunal, Court on all hearings and will inform the Advocate for appearance when the case is called.

And I/We undersigned do hereby agree not to held the Advocate or his substitute responsible for the result of this said case in consequence for his absence from the Court when the said case is called up for hearing or any negligence of the said Advocate(s) or his/their substitute or for any other reason.

And I/We the undersigned do hereby agree that in the event of the whole or any part of the fee agreed by me/us to the Advocate remaining unpaid, they will be entitled/allowed to press upon the same. I/We shall have no objection if the costs are taken by the Advocate.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these present the contents of which have understood by me/us on this 24 day of November, 2024.

  
Client

Accepted by or on behalf of above-named advocates

  
Saurav Sharma

  
Neeraj Kaushik

**SAURAV SHARMA & ASSOCIATES,  
LAWYERS & SOLICITORS**

Address: T-303, Adore Exclusive, Sector-86,  
Faridabad, Haryana 121002

Mobile No: 9999046369/ 8745000740

[srvsharma.adv@gmail.com](mailto:srvsharma.adv@gmail.com)

[stalwartprofessionals@gmail.com](mailto:stalwartprofessionals@gmail.com)

IN THE MATTER OF

MR. JATINDER SETHI &amp; ORS. --- APPLICANTS

VERSUS.

UNION OF INDIA &amp; ORS. --- RESPONDENT.

## PROOF OF SERVICE.

Respectfully Submits that

1. The Copy of Response / Reply by way of affidavit of Respondent no. 7, served to the parties through post date - 28-11-2024. Copy of Receipt enclosed.

For Applicant  
through Counsel

Advocate Saurav Sharma.

<Dial 18002668868> <Wear Masks, Stay Safe>



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<Dial 18002668868> <Wear Masks, Stay Safe>



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<Dial 18002668868> <Wear Masks, Stay Safe>



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<Track on www.indiapost.gov.in>

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**Advance Service of Reply by way of affidavit from answering respondent arrayed as Respondent No. 7 in OA 1068-2024 listed before Hon'ble NGT on 03-12-2024**

1 message

**Adv Saurav Sharma** <srvsharma.adv@gmail.com>

28 November 2024 at 18:55

To: sec-moef@nic.in, "hspcbho@gmail.com" &lt;hspcbho@gmail.com&gt;, hspcb@hry.nic.in, "vikas@capexlegal.com" &lt;vikas@capexlegal.com&gt;, comm.fbd-hry@gov.in

Respected sir,

I, Mr.Saurav Sharma, counsel appointed in the matter, addressing you on behalf of our client who received a copy of application filed in the matter OA-1068-2024 ". I have been instructed to serve you with the copy of Response/ Reply by way of Affidavit filed with Hon'ble National Green Tribunal, New Delhi in the matter titled as " **Jatinder Sethi & Ors (Applicants) vs. Union of India & Ors.(Respondents)**.

The Copy of the Reply/Response is attached herewith for your reference and necessary action.

You are requested to kindly acknowledge the receipt of the same for our reference and records. In case of filing defects, the rectified copy will be served to you accordingly.

Yours truly,  
Saurav Sharma, Advocate  
Mobile No. 9999046369  
Email ID: [srvsharma.cs@gmail.com](mailto:srvsharma.cs@gmail.com)


**SAURAV SHARMA & ASSOCIATES**  
Lawyers & Solicitors

Chamber No. 224-A, IInd Floor, Lawyers Chambers Building,

District Court, Sector-12, Faridabad (Hr.)-121006

Resi. Cum off: T 303 Adore Exclusive, Sector-86, Greater Faridabad, Haryana-121002

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