

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 508 OF 2025**

**IN THE MATTER OF:**

**PURAN**

**...APPLICANT**

**VERSUS**

**STATE OF UTTAR PRADESH & ORS.**

**...RESPONDENTS**

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**DATE: 11.04.2026**

**PLACE: NEW DELHI**

**THROUGH:**



**(RACHIT MITTAL)**

**ADVOCATE FOR RESPONDENT NO. 9**

**RM Law Chambers**

**MZ- 24 & 25, Ansal Fortune Arcade,**

**Sector 18, Noida, U.P. – 201 301**

**Contact No.: 0120- 4998794**

**EMAIL: rachit@rmlawchambers.in**

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REPLY ON BEHALF OF MATHURA VRINDAVAN  
DEVELOPMENT AUTHORITY

MOST RESPECTFULLY SHOWETH:-

1. That the present Reply is being filed by the Mathura Vrindavan Development Authority (hereinafter referred to as "*Answering Respondent/Respondent No. 9/MVDA*") to the Application bearing O.A. No. 508 of 2025 filed by Puran (hereinafter referred to as "*Applicant*") under Sections 14 & 15 of the National Green Tribunal Act, 2010 (hereinafter referred to as "*Act*") read with Rule 8 of the National Green Tribunal (Practice and Procedure) Rules, 2011 seeking necessary directions.



2. At the outset, the Answering Respondent denies all the averments made in the Application filed on behalf of the Applicant to the extent they are contrary or inconsistent with the contents of the Reply. Nothing contained in the Application filed by the Applicant should be deemed to have been admitted, save as expressly stated herein.
  
3. That the Application filed by the Applicant is replete with factual perversity and contains incorrect and misconceived submissions. It is submitted that the Applicant had pleaded incongruent averments and has based the Application on false surmise and vague conjectures. The Applicant has misleading and contradictory averments in his Application and has blatantly suppressed material facts with an intent to mislead this Hon'ble Tribunal. Hence, in view of the above, the Applicant is not entitled to any relief whatsoever.

#### **PRELIMINARY SUBMISSIONS & OBJECTIONS**

4. That the present matter pertains to a prayer for the immediate stoppage of manifestly illegal construction being carried out within the "prohibited construction zone" of the "Kachchi Parikrama



Marg” situated in the holy town of Govardhan, District Mathura, and for the removal of encroachments being made upon forest land in violation of the binding judgments and directions of the Hon’ble Supreme Court and the Hon’ble National Green Tribunal.

5. It is submitted that the Complainant has annexed herewith the letter dated 18.04.2025 issued by the Office of the Range Forest Officer, Govardhan Range, Social Forestry Forest Division, Mathura, which was addressed to the Sub-Divisional Magistrate, Govardhan, in continuation of his letter dated 09.04.2025, stating inter alia that, as per the report of the Lekhpal, one Chaitanyadas, resident of Kadamkhandi, in the application submitted by him, has alleged that after the demise of Sant Jagdanand Ji on 19.03.2025, who had been residing at the ancient Kadamkhandi situated on Jatipura Parikrama Marg, certain persons from Jatipura are harassing the sadhus residing in the ashram by claiming the ashram land to belong to the Devasthan Department of Rajasthan.



6. That, on the basis of the said complaint, the Lekhpal conducted measurement/demarcation of the said land. As per the report of the Lekhpal, the site in question falls within Khasra Nos. 637 and 632 of Mouja Jatipura, which, in the revenue records, is recorded as land belonging to the Forest Department. In compliance with the directions, an inquiry was conducted, and the site was inspected by Forest Guard Ashish Kumar Singh and Forest Watcher Kushalpal. As per the map of the Forest Department, the said location is shown in Block No. 1, under old Khasra Nos. 263, 266, and 268, as Chak No. 03. Four boundary pillars are installed at the four corners, and Chak No. 03 does not fall within the boundary of the Forest Department. That, upon inquiry from persons present at the site, it was revealed that Sant Jagdanand Ji had been residing on the land shown as Chak No. 03, and after his demise, Sant Shri Chaitanya Krishnadas is presently residing there.
7. It is submitted that the officials of the Respondent No. 9 prepared a report dated 01.04.2026 stating that no litigation in relation to the

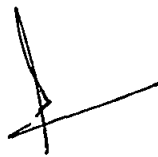


subject matter was found to have been instituted from the financial year 2015–16 up to the present.

8. It is pertinent to note that upon a spot inspection conducted on 31.03.2026, it was found that the site comprises seven huts and one temple located in the centre, with an approximate area of 900 square metres. A boundary wall already exists at the site. The temple bears an inscription/board recording Samvat 1994, and a board bearing the name 'Mahant Chaitanya Krishna Das Kadamkhandi, Jatipura is fixed on the boundary wall of the premises. The saints present at the site informed that the construction is approximately 85–90 years old. Copy of the photographs of the site are being annexed herewith and marked as ANNEXURE R-1.

#### PARAWISE REPLY

9. That the contents of Paragraph No. 1 of the Application pertain to the revenue records, and hence there is no need for a response on behalf of the Answering Respondent.



10. That the contents of Paragraph No. 2 of the Application are a matter pertaining to the Revenue Department and hence need no reply.

11. That the contents of Paragraph No. 3 of the Application are incorrect, unfounded, and are therefore vehemently denied. It is submitted that the allegation to the effect that a new pucca wall has been unlawfully constructed on forest land is wholly misconceived and unsupported by facts. It is further submitted that, as per the joint report dated 01.04.2026 submitted by the officials of the Answering Respondent along with the enforcement department report of the Answering Respondent dated 31.03.2026 referred therein, it has been categorically recorded that with respect to Khasra Nos. 632B and 637B situated in Mauza Jatipura, no case has been found to have been instituted or recorded in the computerised records from the financial year 2015-16 till date. In view of the above, it is evident that no new construction exists on the said land, and the averments made by the Applicant are false, misleading, and devoid of merit.



12. That the contents of Paragraph No. 4 of the Application do not pertain to the Answering Respondent; hence, need no reply.

13. That the contents of Paragraphs No. 5 and 6 of the Application pertain to the reports of the Forest Officer and the Lekhpal; therefore, no reply is needed on behalf of the Answering Respondent.

14. That the contents of Paragraph No. 7 and 8 of the Application are wrong, baseless and hence vehemently denied. It is submitted that the Applicant has alleged the construction of a wall on forest land and the felling of several old Peepal trees through the use of JCB machines; however, such allegations are wholly unsubstantiated. Nevertheless, in view of the assertions made by the Applicant, appropriate responsibility, if any, may be determined at the level of the Forest Department and the concerned revenue authorities.

15. That the contents of Paragraph No. 9 of the Application pertain to the Applicant and the Forest Department, and therefore, no is needed on behalf of the Answering Respondent.



16. That the contents of Paragraph No. 10 of the Application are misleading, baseless and hence vehemently denied. It is submitted that inasmuch as the Applicant has alleged construction of a wall on forest land and has placed reliance upon the Lekhpal's report dated 09.04.2025, it is expedient that appropriate and effective responsibility, if any, be duly ascertained and fixed at the level of the Forest Department as well as the concerned revenue authorities in accordance with law.

17. That the contents of Paragraphs No. 11 and 12 of the Application are matters of record and hence need no reply.

18. That the contents of Paragraphs No. 13 of the Application are incorrect, baseless and hence vehemently denied. It is submitted that, as per reports of the officials of the Answering Respondent, clearly records that with respect to Khasra Nos. 632B and 637B situated in Mauza Jatipura, no case has been instituted or reflected in the computerised records from the financial year 2015-16 till date, thereby negating the allegation of any new wall construction.



Further, the same concerns apply to the Forest Department and hence no specific reply is needed from the Answering Respondent.

19. That the contents of Ground A to Ground H of the Application are wrong, baseless and hence vehemently denied.

20. The contents of the prayer for immediate relief are denied in their entirety and are devoid of any veracity.

In light of the aforementioned submissions, it is respectfully prayed that the application be dismissed qua the Respondent No. 9, i.e., the Mathura-Vrindavan Development Authority.

  
**RESPONDENT NO. 9**  
**MATHURA VRINDAVAN DEVELOPMENT AUTHORITY**

**DATE: 11.04.2026**

**PLACE: ~~Noida~~ New Delhi**

**THROUGH:**



**(RACHIT MITTAL)**

**ADVOCATE FOR RESPONDENT NO. 9**

**RM Law Chambers**

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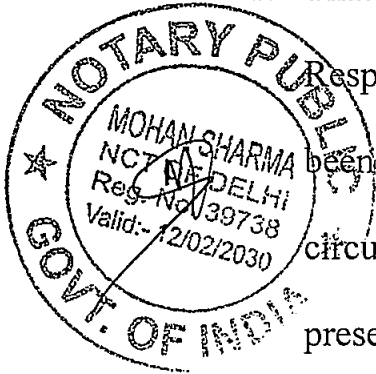
**STATE OF UTTAR PRADESH & ORS.**

**...RESPONDENTS**

**AFFIDAVIT**

I, Sumit Kumar, S/o Shri Ajaypal Singh, aged about 32 years, posted as Assistant Engineer, Mathura Vrindavan Development Authority, Government Museum, Dampier Nagar, Mathura, Uttar Pradesh – 281001, presently at New Delhi, do hereby solemnly affirm and state as under:-

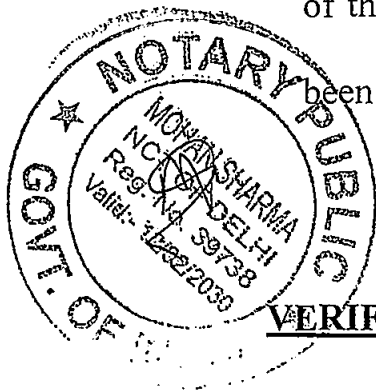
1. That I am working as an Assistant Engineer in the office of the Respondent No. 9 in the above-mentioned Application, having been authorised and well acquainted with the facts and circumstances of the case and hence competent to swear the present affidavit.



2. That I have read and understood the contents of the present Reply, which has been drafted by the Counsel under my instructions, and

/

I say that the facts stated therein are true and correct to my knowledge based on the records, contents whereof are not repeated for the sake of brevity and may be read as part and parcel of this affidavit. No part of it is false and nothing material has been concealed therefrom.



*[Signature]*  
DEPONENT

**VERIFICATION**

I, the deponent hereinabove, do hereby verify and state that the contents of paras 1 to 2 of the Affidavit are true and correct to the best of my knowledge and belief derived from the official record of it is false and nothing material has been concealed therefrom.

*As per [Signature]* has signed  
I identify the deponent who has signed  
put thumb impression in my presence

11 APR 2026

Verified and signed at New Delhi on 11<sup>th</sup> day of April, 2026.

*[Signature]*  
DEPONENT

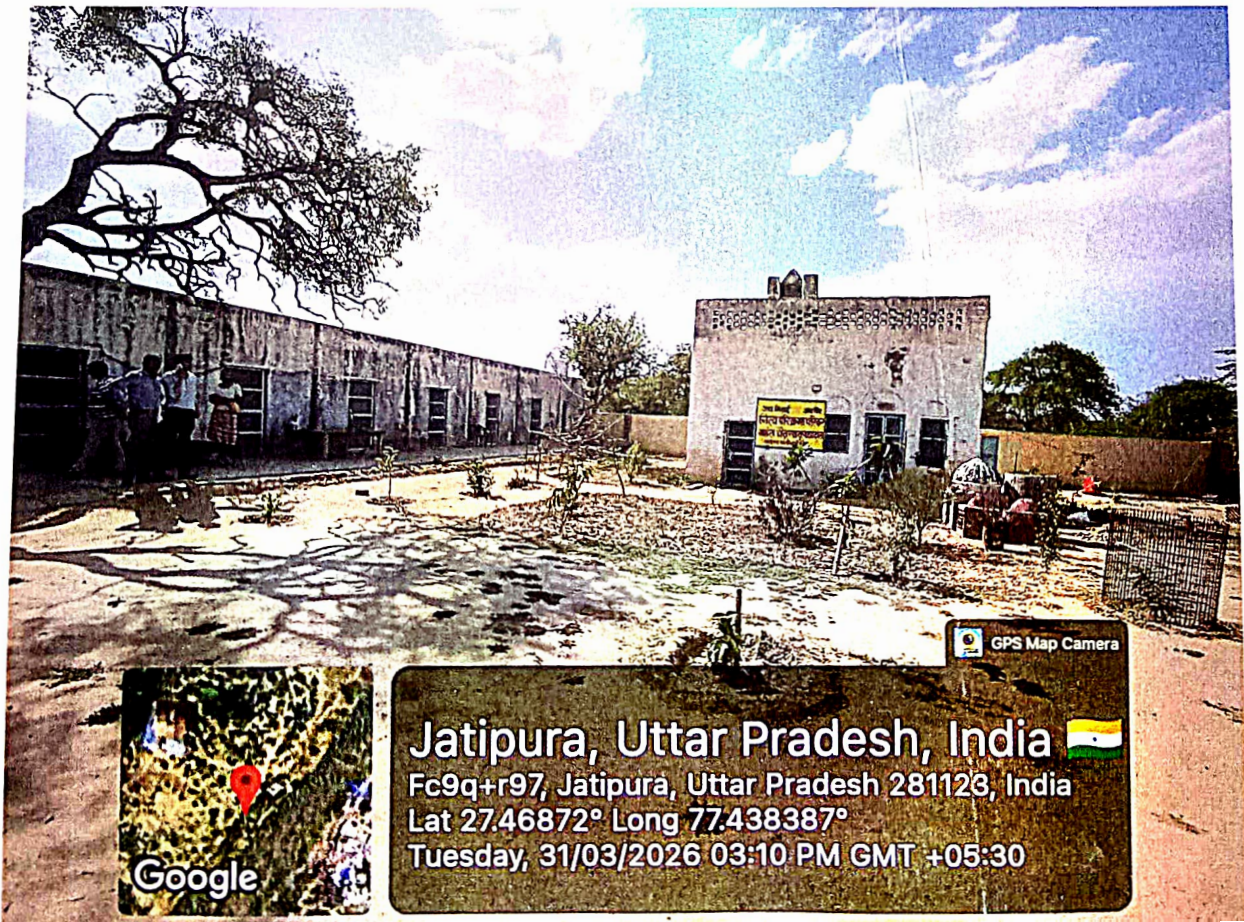
**ATTESTED**



*[Signature]*  
NOTARY PUBLIC, DELHI  
GOVT. OF INDIA

CERTIFIED THAT THE DEPONENT  
Shri / Smt. / Km. *Sunita K*  
S/o, W/o, D/o *May Raj Singh*  
Identified by Shri *A. Sharma*  
has solemnly affirmed before me at Delhi  
on *11 APR 2026* as Sl. No. *21A*  
That the contents of the affidavit which  
have been read & explained to me are  
true and correct to his knowledge

*[Signature]*  
Notary Public





GPS Map Camera



### Jatipura, Uttar Pradesh, India



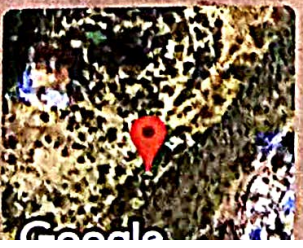
Fc9q+r97, Jatipura, Uttar Pradesh 281123, India

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GPS Map Camera



### Jatipura, Uttar Pradesh, India



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Google

GPS Map Camera

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