

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH NEW DELHI  
ORIGINAL APPLICATION NO. 498 OF 2024**

**IN THE MATTER OF**  
Shrichand

.... APPLICANT

VERSUS

State of Uttar Pradesh & Ors.

.... RESPONDENT(S)

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Respondent No. 13

THROUGH

*Yash Vardhan Kaushik*  
**YASH VARDHAN KAUSHIK**  
**ADVOCATE**

**W-6 TIGERLANE, SAINIK FARMS, NEW DELHI**

**EMAIL: [yashvardhankaushik97@gmail.com](mailto:yashvardhankaushik97@gmail.com)**

**PHONE: 9990226669**

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**REPLY ON BEHALF OF RESPONDENT NO. 13, M/s SS BOHRE  
BRICKS INDUSTRY, KHASRA NO. 245**

**MOST RESPECTFULLY SHOWETH:**

This reply is humbly submitted in accordance with the National Green Tribunal's order dated 20.08.2024, requiring all respondents to submit their replies in the form of an affidavit. That this response specifically addresses the allegations against brick kiln, M/s SS Bohre Bricks Industry, outlines the initial complaint and provides an update on the current status of your brick kiln's operations and any pending actions.

1. That it is humbly submitted that the Respondent, M/s SS Bohre Bricks Industry, situated at Khasra No. 245, Village - Ujhani Bangar, Tehsil Chhata, District Mathura, is a brick manufacturing unit, currently not operational. The Respondent, being a law-abiding business, is committed to adhering to environmental regulations and has proactively taken steps to rectify any initial deficiencies in its operations.
2. That the Closure Order was issued against the brick kiln on 29.03.2022 against M/s SS Bohre Bricks Industry
3. That the Respondent acknowledges the Closure Order and initial deficiencies on operating without valid CTO and Air Water Consent. We have been non-operational since the Closure Order was issued and are now taking immediate steps to apply for CTO and secure the required air and water consents.

4. Furthermore, a letter has been sent to the Regional Officer (RO) of the Uttar Pradesh Pollution Control Board (UPPCB), Mathura, requesting a revisit to the brick kiln premises to assess the implemented updates and compliance measures. The RO's visit will verify adherence to environmental regulations and determine the kiln's eligibility to apply for Consent to Operate (CTO) and necessary consents for air and water pollution. The brick kiln operators are committed to environmental compliance and await the RO's assessment to proceed with the CTO and consent application process.
5. That the Respondent is fully committed to rectifying any remaining deficiencies and ensuring the sustainable and responsible operation of the brick kiln. The Respondent has submitted an affidavit of non-operation, declaring that operations will not commence until all compliance requirements are fully met and verified. The affidavit is attached as **Annexure 1**.
6. That in light of the facts and submissions stated above, the Respondent humbly prays that this Appellate Authority may be pleased to quash the Closure Order, providing the Respondent with a fair opportunity to rectify the alleged compliance violations.

THROUGH

*Yashvardhan Kaushik*  
**YASH VARDHAN KAUSHIK**  
**ADVOCATE**

**W-6 TIGERLANE, SAINIK FARMS, NEW DELHI**

**EMAIL: [yashvardhankaushik97@gmail.com](mailto:yashvardhankaushik97@gmail.com)**

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INDIA NON JUDICIAL  
495  
Government of Uttar Pradesh



IN-UP72771197506151W

e-Stamp

BANWARI LAL  
ACC. ID: UP14380504  
CHHATA MATHURA  
Lic.No. 24/2002-2003

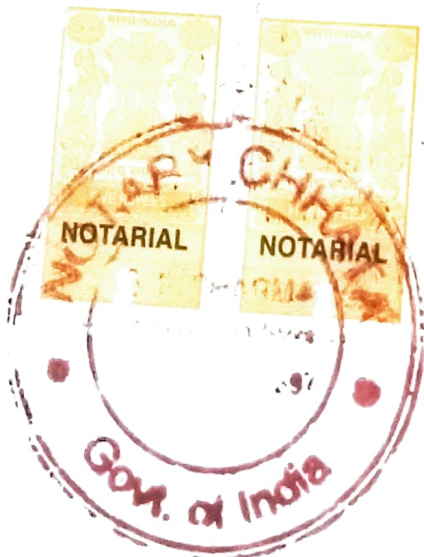
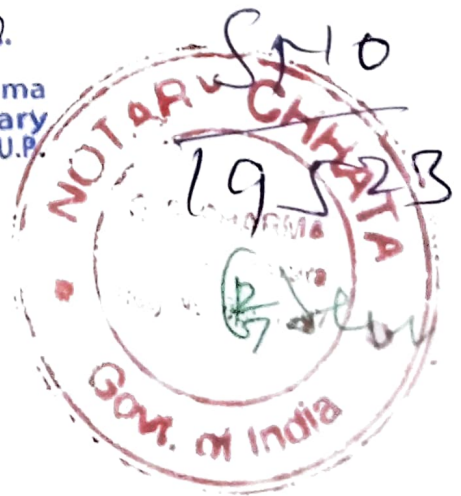
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Purchased by	: S S BHORE BRICKS UDYOG
Description of Document	: Article 4 Affidavit
Property Description	: Not Applicable
Consideration Price (Rs.)	:
First Party	: S S BHORE BRICKS UDYOG
Second Party	: Not Applicable
Stamp Duty Paid By	: S S BHORE BRICKS UDYOG
Stamp Duty Amount(Rs.)	: 10 (Ten only)



Please write or type below this line

Notarial Stamp Rs. 10.

Govind Kant Sharma  
Public Notary  
CHHATA (Mathura) U.P.



Affidavit

I Radhe Shyam, aged. 46....years, resident of... *Dhimari Teh. Chhata (Mathura)*  
do hereby solemnly affirm and state on oath as follows:

1. I am the owner/proprietor of SS Bohre Bricks Udyog, located at Khasra 245, Tehsil Chatta.
2. I am fully aware of the "Uttar Pradesh Brick Kilns (Siting Criteria for Establishment) Rules, 2012" and other applicable environmental regulations.
3. I hereby declare that SS Bohre Bricks Udyog will **not operate** until all the following conditions are met:

o **Siting Criteria Compliance:** The brick kiln's location and distances from surrounding features (villages, roads, water bodies, other brick kilns, etc.) fully comply with the prescribed siting criteria.

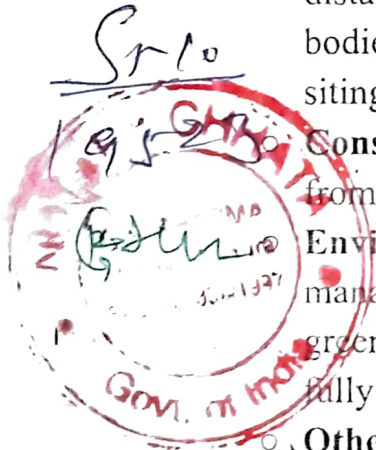
o **Consent to Operate (CTO):** A valid CTO has been obtained from the Uttar Pradesh Pollution Control Board (UPPCB).

o **Environmental Management:** All necessary environmental management measures, including pollution control equipment, green belts, and waste management systems, are in place and fully operational.

o **Other Compliance Requirements:** Any other outstanding compliance issues or deficiencies identified by the UPPCB have been fully addressed and rectified.

4. I understand that the UPPCB will conduct inspections to verify compliance with the above conditions before granting permission to operate.

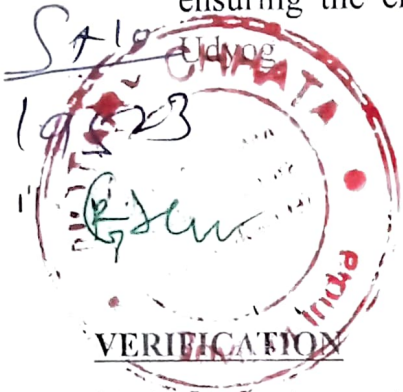
5. I am committed to pursuing all legal avenues to resolve this matter and ensure the lawful operation of my brick kiln and after complying



with all objections I will initiate the process of filing an appeal to set aside Environmental Compensation (EC) imposed on my brick kiln.

6. I am aware that any attempt to operate the brick kiln before fulfilling the aforementioned conditions may result in legal action, including penalties, closure orders, and further environmental compensation.

7. This affidavit is submitted in good faith and with the intention of ensuring the environmentally sound operation of SS Bohre Bricks



राधेश्याम

DEPONENT

VERIFICATION

Verified on solemn affirmation at Tehsil Chhata on this \_\_\_\_ day \_\_\_\_ of 2024, that the contents of the foregoing affidavit are true and correct to the best of my knowledge and no part of it is false and nothing material has been concealed therefrom.

राधेश्याम

DEPONENT

Radhi Shyam s/o Birendra Singh  
R/o Dhimari Teh- Chhata  
(Mathura)  
U.P

The Court read over the documents  
read over who is  
an affidavit  
before me  
Notary  
and char  
राधेश्याम  
अमाते  
23/11/23  
30 19/5/23  
Sharma  
Mathura

I know him  
and he has signed/aff  
before me.  
Signature



INDIA NON JUDICIAL

Government of Uttar Pradesh



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e-Stamp

BANWARI KAL  
ACC. ID: UP14380504  
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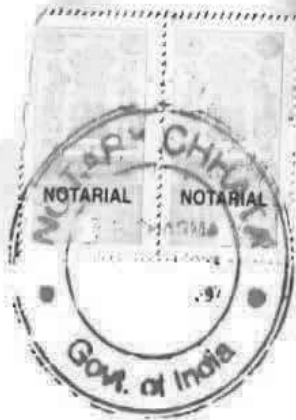
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Stamp Duty Amount(Rs.)	: 10 (Ten only)



Please write or type below this line

Notarial Stamp Rs. 10

Govind Kant Sharma  
Public Notary  
CHHATA (Mathura) U.P.



Notary Alert

The authenticity of the stamp certificate should be verified at [www.shikhestamp.com](http://www.shikhestamp.com) or using e-Stamp Mobile App of Stock Holding Corporation of India. Any discrepancy in the details on the Certificate and as available on the website / Mobile App renders it invalid. Verifying the legitimacy is on the users of the certificate.

Affidavit

I Radhe Siani, aged 46.... years, resident of Dhimari Teh. Chhata (Methua)  
do hereby solemnly affirm and state on oath as follows:

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राधेश्याम

DEPONENT

Verified on solemn affirmation at Tehsil Chhata on this \_\_\_\_ day \_\_\_\_ of 2024, that the contents of the foregoing affidavit are true and correct to the best of my knowledge and no part of it is false and nothing material has been concealed therefrom.

राधेश्याम

DEPONENT

Radhi Shyam s/o Biji Sundeja Singh  
R/o Dhimari Teh Chhata  
(Mathura)  
U.P

The Commissioner  
Tehsil Chhata  
Mathura  
U.P.  
23/11/24  
Sharma  
Mathura

I AM the  
and he has signed it  
Signature

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...APPLICANT

VERUS

State of Uttar Pradesh &amp; Ors.

... RESPONDENT(S)

KNOW ALL to whom these presents shall come that I, Radhe Shyam Uttar Pradesh the above-named Applicant do hereby appoint **YASH VARDIAN KAUSHIK (D/5882/2022) ADVOCATE W-6, TIGER LANE, SAINIK FARMS 110080 PH.: 9990226669, EMAIL: YASHIVARDHANKAUSHIK97@GMAIL.COM** (hereinafter called the Advocate/s) to be my/our Advocate in the above noted case and authorize them:- 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 executions 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 subject to payment of fees for each stage. To file and take back documents, to admit and/or deny the documents of the 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. To deposit, draw and receive monies, 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 or person authorising him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and 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 authorised agents would appear in Court on all hearings and will inform the Advocate for appearance when the case is called. And I/We the 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 for himself. And I/We the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us. 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        day        of, 2025. Accepted subject to the terms of fees.

ADVOCATE

*Yash Kaushik*

CLIENT

*राधेश्याम*