

## BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

## PRINCIPAL BENCH NEW DELHI

## ORIGINAL APPLICATION NO. 1150 OF 2024

## IN THE MATTER OF:

D5 &amp; D8 RESIDENTS' WELFARE ASSOCIATION,

MODEL TOWN, NEW DELHI

... APPLICANT

VS.

HORTICULTURE DEPARTMENT OF MUNICIPAL

CORPORATION DELHI, KESHAVPURAM ZONE

... RESPONDENT

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M.D.O.H. 14-07-2025

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DATE:

PLACE: NEW DELHI

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**REPLY ON BEHALF OF RESPONDENT NO. 2 (MODEL TOWN  
DHARMIK LEELE COMMITTEE)**

**MOST RESPECTFULLY SHOWETH:**

1. The present reply is being filed on behalf of Respondent No. 2, the Model Town Dharmik Leela Committee (hereinafter referred to as "the Committee"), in response to the Original Application (OA) bearing no. OA No. 1150 of 2024 filed by the Applicant herein under Section 14 of the National Green Tribunal Act, 2010.

**PRELIMINARY SUBMISSIONS:**

2. At the very outset, the Committee unequivocally denies all allegations pertaining to environmental violations, illegal activities, or

mismanagement of Jawahar Park (hereinafter referred to as “the Park”) as levelled by the Applicant. The Committee has been organizing the culturally significant Ramleela event in the Park since the year 1954, a tradition deeply embedded in the social and religious fabric of the residents of not only Model Town area but even outside. These events have been consistently held with the prior written permissions of the Municipal Corporation of Delhi (MCD), along with requisite approvals from the Fire Department, Police authorities, and other statutory agencies, as mandated by law. The Applicant’s assertions of environmental violations are vague, unsubstantiated, and devoid of any cogent evidence. The long-standing practice of holding the event, spanning over seven decades, and supported by documentary permissions from 2006 onwards, manifestly establishes the legality, legitimacy, and social acceptance of the event. Copies of permissions for the period 2006 to 2024 are annexed herewith and marked as **Annexure R-1 (Colly)**.

3. The Committee’s actions are in strict conformity with the Memorandum of Understanding (MoU) dated 25 August 2021, executed with the Horticulture Department of the MCD, Keshavpuram Zone (Respondent No. 1), which was further renewed for an additional term of three years by a subsequent vide letter dated 24.10.2024. The Committee has consistently adhered to all applicable environmental regulations, MCD policies, and judicial pronouncements. No instance of non-compliance or deviation from

- the terms of the MoU has occurred, and any assertions to the contrary are categorically denied. The copy of the Memorandum of Understanding (MoU) dated 25.08.2021 is attached herewith and marked as **Annexure R-2**. The copy of the Letter dated 24.10.2024 is attached herewith and marked as **Annexure R-3**. Photographs showing the well-maintained condition of the Park is attached herewith and marked as **Annexure R-4**.
4. The allegations set forth in the Original Application (OA) are not only baseless and factually incorrect but appear to be driven by extraneous motives aimed at discrediting the Committee and undermining its rightfully conferred responsibilities. It is submitted that the Applicant's apparent intent is to gain control of the Park under the guise of environmental concern, despite lacking any evidence of mismanagement. Vague averments and broad generalizations cannot serve as the basis for judicial intervention. On the contrary, the Park is meticulously maintained during and after the Ramleela festivities, as is evident from the photographs attached above.
  5. The Committee has proactively undertaken comprehensive maintenance of the Park in accordance with the stipulations of the MoU. These efforts include regular plantation drives, employment of dedicated gardening staff, and infrastructural upkeep. The renewed MoU dated 25.08.2024 further attests to the Committee's satisfactory performance and commitment to maintaining the Park. The MCD, after due consideration, entrusted the

Committee with the Park's adoption in 2021 and reaffirmed this decision in 2024. It is pertinent to note that although the Park was designated as an ornamental park in 2019, the Ramleela event has been held uninterrupted since 1954, decades prior to such classification, demonstrating its entrenched and permissible nature. No environmental degradation or harm has resulted from the event. It is further submitted that the families and relatives of the resident themselves attend the event in the large number every year, which establishes that the Applicant herein does not represent all the residents.

6. It is further submitted that the Ramleela event is confined to a period of 10 days annually, in strict consonance with the directions of the Hon'ble Supreme Court in *M.C. Mehta v. Union of India (2009) 17 SCC 683*. While permissions have been sought for a preparatory and dismantling period aggregating 30 days, the event itself remains limited to 10 days. The Applicant's assertion that the Park is occupied for "one and a half months" is palpably incorrect and misleading. The Park is available for use of the general public. Similarly, the sweeping allegation that the Committee "destroys trees and plants" is without merit and emphatically denied. Temporary structures are installed and dismantled without inflicting damage to the Park or its greenery.
7. The Dussehra effigy-burning ceremony is conducted with full compliance to safety protocols and upon obtaining necessary permissions from the Fire

Department and Police authorities. The site selected for the ceremony is situated away from sensitive infrastructure such as electric lines or gas pipelines, and no incidents of damage or hazard have ever been reported. The Committee ensures the presence of fire tenders and maintains coordination with emergency services. Further, the use of diesel generators, food stalls, and sound systems is strictly within the parameters of environmental and municipal regulations, including the Noise Pollution (Regulation and Control) Rules, 2000. Waste management is carried out systematically, with post-event cleanup ensuring restoration of the Park's condition. The Applicant's hyperbolic claims regarding "huge traffic jams" and disregard for public safety are devoid of evidence and are aimed at sensationalism rather than reasoned discourse.

8. The classification of the Park as an ornamental park in 2019 does not render pre-existing cultural practices impermissible. The Ramleela event, being an established tradition predating such classification by several decades, remains permissible under law. MCD circulars dated 22.08.2013 do not place an absolute embargo on holding events of a cultural or religious nature within such parks, particularly when prior permissions are duly obtained. The Committee's continued use of the Park for Ramleela, with full approval from the MCD and other relevant authorities, is entirely lawful and in accordance with the Park's character and usage.

9. The Committee has not only complied with the terms of the MoU but has also taken measures to improve the infrastructure of the Park. Claims regarding broken footpaths, damaged benches, or unauthorized tree cutting are either grossly exaggerated or patently false. No link has been established between any such purported damage and the actions of the Committee. The MCD's decision to renew the MoU in 2024 is a testament to its satisfaction with the Committee's stewardship and directly contradicts the Applicant's baseless assertions. The Committee reserves the right to file additional documents, evidence, and submissions as may be necessary during the course of proceedings.

**PARA-WISE REPLY:**

1. The contents of Para 1 are denied in toto. The Applicant's allegations of "blatant violations of environmental laws" by the Committee during the Ramleela function are vague, unsubstantiated, and devoid of evidence. The Ramleela has been held since 1954 with MCD permissions and approvals from relevant authorities, including the Fire Department and Police, ensuring compliance with environmental and safety norms. The Applicant's claim of "irreparable damage" to the Park and interference with residents' rights is baseless, as the event is limited to 10 days, and the Park is restored post-event.

2. The contents of Para 2 are denied in toto except to the extent admitted. It is admitted that the Park is 0.93 acres and located in Block D, Model Town. It is denied that the park has been established for the recreational purpose of around 80 families of Blocks D5 & D8 Model Town. It is submitted that the Park is for the use of the general public. The Applicant's claim that residents solely maintained the Park is misleading. Since 2021, the Committee has maintained the Park under the MoU with MCD, undertaking plantation drives, employing gardeners, and ensuring upkeep as per the DDA Adoption Policy 2019. Allegations of "illegal activities" and "deterioration" are false, as evidenced by the renewed MoU dated 25 August 2024 (**Annexure R-3**).
3. The contents of Para 3 are denied in toto. The Ramleela event is held for 10 days, not "one and a half months," in compliance with *M.C. Mehta* (supra). Permissions cover a 30-day preparatory/dismantling period, causing no disruption prior or beyond the event days. Allegations of tree destruction or gate removal are false; temporary structures are installed without permanent damage. The RTI response cited by the Applicant confirms repairs were made, negating claims of violations. The Superintendent's letter is being misconstrued, as no trees were damaged, and safety measures were ensured.
4. The contents of Para 4 are denied in toto. The effigy-burning is conducted with Fire Department approvals, at a safe distance from the power

substation and gas pipeline, with fire tenders on standby. No incidents have occurred in 70 years. Diesel generators and food stalls comply with environmental norms, and loudspeakers adhere to Noise Pollution Rules, 2000. Waste is managed systematically, with post-event cleanup. Allegations of traffic jams and safety violations are exaggerated and unsupported.

5. The contents of Para 5 are denied in toto except the matter of facts. The *M.C. Mehta* Judgement permits functions for 10 days, which the Committee adheres to. The Tribunal's observations in O.A. 392/2021 are inapplicable, as the Ramleela complies with environmental norms, including waste management and noise control, as evidenced by permissions. The Applicant's reliance on these orders is misplaced and misconceived.
6. The contents of Para 6 are denied in toto. The Ramleela is a cultural event, not a revenue-driven activity, held with MCD approvals since 1954. Allegations of ignoring rules or causing hazardous consequences are baseless. The Committee ensures compliance with environmental laws, and the Park is restored post-event.
7. The contents of Para 7 are denied in toto. The Park's ornamental status since 2019 does not prohibit pre-existing cultural events like the Ramleela, which has MCD approvals predating and postdating the classification.

- MCD circulars do not ban such events when permitted. The Applicant's RTI response confirms the status but does not negate permissions granted.
8. The contents of Para 8 are denied in toto. The 2019 order cited by the Applicant was not implemented as a blanket ban, given the Ramleela's historical precedence and permissions. In fact, the Committee entered into Memorandum of Understanding (MoU) dated 25 August 2021 with the Horticulture Department of the MCD, Keshavpuram Zone for development/ maintenance of the Park. The Applicant's claim of no permissions is false, as approvals from MCD, Fire Department, and Police are obtained annually. The Applicant's letters were addressed, and permissions exist, contrary to their assumption.
  9. The contents of Para 9 are denied in toto. Judicial pronouncements emphasize recreational use but do not prohibit cultural events with approvals. The Ramleela is held for 10 days with permissions, not curtailing residents' access beyond this period. The suggestion to shift to D Park ignores the Ramleela's historical association with Jawahar Park since 1954, supported by community acceptance and MCD approvals.
  10. The contents of Para 10 are denied in toto. It is denied that the residents of Blocks D5 & D8 Mode; Town were taking care of the park. The Committee has no knowledge of any application made by the Applicant to the MCD. The antecedents of the Applicant society are in doubt.

11. The contents of Para 11 are denied in toto. It is reiterated that the Applicant's antecedents are in doubt. The MCD has lawfully entered into the MoU with the Committee in 2021 and renewed in 2024. Allegations of mala fide intent are baseless. The Committee's adoption was transparent and lawful.
12. The contents of Para 12 are denied in toto. The Committee has maintained the Park as per MoU terms, including landscaping, plantation, and upkeep. Allegations of neglect are false, as evidenced by MCD's renewal of the MoU and photographs. The Applicant's claims of broken footpaths or gates are exaggerated, and no link to the Committee's actions is established.
13. The contents of Para 13 are denied in toto. The Committee complies with the MoU, and the Park is accessible to the public without fees. Temporary structures for Ramleela are permitted and removed post-event, causing no permanent damage. The 2024 RTI reply of MCD does not show any fault on the part of the Committee and in fact shows that the Park is maintained properly.
14. The contents of Para 14 are denied in toto. The Applicant is relying upon an old notice of 2 years ago to contend that the present condition of the Park is unsatisfactory. The contention is without merit. The notice dated 21.03.2022 was addressed by the Committee, and subsequent inspections confirmed compliance. Further, the Committee has sent a detailed reply dated 13.04.2022, wherein all the concerns were addressed in details along

with the photographs. The Park's condition is satisfactory, as evidenced by the MoU renewal (**Annexure R-3**) and photographs (**Annexure R-4**). The Applicant's complaints are repetitive and lack specificity. Residents are not prevented from beautification efforts, contrary to claims. The reply dated 13.04.2022 is attached herewith and marked as **Annexure R-5**.

15. The contents of Para 15 are denied in toto. The Committee has no knowledge of application made by the Applicant. It is however, reiterated that there are doubts over the genuineness of the Applicant. It is not even known how many members it has. The Applicant's apprehension of a new MoU is speculative, as the renewal has already occurred lawfully.

16. The contents of Para 16 are denied in toto. It is denied that the Applicant has any genuine grievance or that it has run from pillar to post. It is submitted that there has been a very long history of Ramleela functions being conducted at the Park and the ornamental status does not prohibit the event. Ram Leela functions are themselves for the public benefit. It is a community event that promotes social and religious learning, cultural preservation, and provides entertainment for a wide audience. It is reiterated that the MoU with the Committee was lawful, and the Park is maintained properly.

17. The contents of Para 17(A) are denied in toto. The Applicant's assertion that the Municipal Corporation of Delhi (MCD) and the Committee have failed to ensure compliance with environmental laws, including the Air

(Prevention and Control of Pollution) Act, 1981, the Water (Prevention and Control of Pollution) Act, 1974, and the Noise Pollution (Regulation and Control) Rules, 2000, is wholly baseless and unsupported by evidence. To the contrary, the Committee operates with meticulous adherence to all applicable environmental regulations, as evidenced by the consistent procurement of requisite permissions from the MCD, Fire Department, Delhi Police, and other statutory authorities for the Ramleela event. These permissions are granted only after rigorous scrutiny to ensure compliance with environmental and safety norms. The Applicant's vague and sweeping allegations fail to specify any particular violation, rendering them incapable of judicial scrutiny. The Committee employs systematic waste management, ensures noise levels remain within permissible limits, and prevents any discharge that could contravene air or water pollution laws. The Applicant's attempt to paint a picture of environmental neglect is a deliberate misrepresentation, aimed at undermining a culturally significant event that has been conducted lawfully for over seven decades. The MCD's oversight and the Committee's compliance ensure that the Park remains an ecological asset, not a victim of degradation as falsely claimed.

18. The contents of Para 17(B) are denied in toto. The Applicant's contention that the Ramleela event violates the Hon'ble Supreme Court's directive in *M.C. Mehta v. Union of India*, (2009) 17 SCC 683 by occupying the Park for more than 10 days is factually incorrect and misleading. The Ramleela

event itself is strictly confined to a 10-day period, in full compliance with the *M.C. Mehta* ruling, which permits functions in parks for up to 10 days. The Applicant's reference to a "40-45 day" occupation is untrue. Furthermore, the actual function is for 10 days. But the Applicant is conflating the preparatory and dismantling phases to ensure seamless execution of the function without causing damage with the event itself. These ancillary periods involve minimal activity, such as setting up temporary stages or removing structures, and do not impede residents' access to the Park beyond the 10-day event. The Applicant's attempt to stretch the scope of the Supreme Court's order to cover authorized preparatory work is legally untenable and ignores the practical necessities of organizing a large-scale cultural event. The Committee's adherence to the 10-day limit for the actual function, coupled with MCD's approval for logistical arrangements, demonstrates unequivocal compliance with judicial directives, rendering the Applicant's ground meritless.

19. The contents of Para 17(C) are denied in toto. The Applicant's claim that the Ramleela is organized without proper permissions or No-Objection Certificates (NOCs) from the Fire Department, Police, or other authorities is patently false and belied by documentary evidence. The Committee has consistently obtained all requisite approvals for the Ramleela event annually, including from the MCD, Fire Department, Delhi Police, and other relevant bodies, as mandated by law. These permissions are granted

only after thorough assessments of safety, environmental, and public order considerations. The Applicant's assertion is speculative, lacking any evidence to contradict the comprehensive permissions secured by the Committee over decades. The MCD's rigorous permitting process ensures that no event proceeds without compliance with statutory requirements, and the Committee's track record of obtaining NOCs since 2006 underscores its commitment to legality. The Applicant's attempt to cast doubt on this process is an exercise in conjecture, unsupported by facts and aimed at creating a false narrative of administrative laxity.

20. The contents of Para 17(D) are denied in toto. The Applicant's allegation that the MCD is responsible for the "degradation" of Jawahar Park, rendering it unfit for residents' use, is a distortion of reality. Far from being degraded, the Park is being diligently maintained by the Committee under the terms of the Memorandum of Understanding (MoU) dated 25 August 2021, renewed on 24.10.2024. The Committee undertakes regular landscaping, plantation drives, garbage clearance, and infrastructural upkeep, ensuring the Park remains aesthetically pleasing and functional. The Applicant's claim of a "terrible condition" is unsupported by specifics or credible evidence, relying instead on generalized assertions. The MCD's decision to renew the MoU in 2024 is a testament to the Committee's satisfactory stewardship, directly contradicting the Applicant's narrative. The Park continues to serve as a recreational space for residents, and any

temporary adjustments during the 10-day Ramleela event are swiftly reversed through post-event restoration. The Applicant's attempt to attribute imagined degradation to the Committee is a ploy to justify their bid for control over the Park, rather than a reflection of its actual condition.

21. The contents of Para 17(E) are denied in toto. The Applicant's argument that the Park's designation as an ornamental park prohibits the Ramleela event is legally and factually flawed. While the Park was classified as ornamental in 2019, this status does not impose an absolute ban on pre-existing cultural events, particularly those with a history predating the classification by decades. The Ramleela has been held in Jawahar Park since 1954, with continuous MCD approvals, establishing its legitimacy as a permissible activity. MCD circulars do not preclude cultural or religious events in ornamental parks when conducted with prior permissions, which the Committee unfailingly secures. The Applicant's interpretation of the ornamental status as an outright prohibition ignores the nuanced balance between environmental preservation and cultural heritage, which the MCD appropriately upholds. The Committee's compliance with environmental norms during the event ensures that the Park's ornamental character is preserved, rendering the Applicant's ground baseless.

22. The contents of Para 17(F) are denied in toto. The Applicant's reliance on the 01.11.2019 order by the Commissioner, North Delhi Municipal Corporation, as a blanket ban on functions in the Park is misconceived.

Thereafter, the Committee had entered into Memorandum of Understanding (MoU) dated 25.08.2021 with the Horticulture Department of the MCD, Keshavpuram Zone for maintenance of the Park. They have been seeking permissions from the MCD for holding of the annual event and after same is obtained the Park is used for a limited period only for the said function. .

23. The contents of Para 17(G) are denied in toto. The Applicant's claim that MCD policies prohibit cultural events in ornamental parks is not correct. MCD policies, including those governing ornamental parks, permit cultural or religious functions when conducted with prior approvals, as is the case with the Ramleela. The Committee's consistent procurement of permissions ensures compliance with these policies, which are designed to harmonize environmental preservation with community activities. The Applicant's attempt to portray the Ramleela as a violation of MCD policy is a distortion, ignoring the explicit approvals granted annually. The MCD's discretion to permit such events reflects a pragmatic approach, recognizing the Ramleela's cultural significance and its negligible impact on the Park's ecology when properly managed. The Applicant's ground is thus devoid of merit.

24. The contents of Para 17(H) are denied in toto. The Applicant's allegation that the MCD illegally grants permissions for the Ramleela is unfounded and contradicted by evidence. The Committee secures lawful permissions

from the MCD, Fire Department, and Police annually, following established procedures. These permissions are issued after due diligence, ensuring compliance with MCD policies and environmental regulations. The Applicant's claim of illegality is speculative, lacking any evidence to challenge the validity of the approvals. The MCD's consistent authorization of the Ramleela over decades underscores its alignment with municipal policies, which accommodate cultural events under regulated conditions. The Applicant's attempt to question the permissions is an unsubstantiated attack on the MCD's administrative prerogative and the Committee's lawful conduct.

25.17I. The contents of Para 17(I) are denied in toto. The Applicant's assertion that the MoU prohibits cultural events in the Park is a misinterpretation of its terms. The MoU dated 25 August 2021, renewed on 24.10.2024, governs the Committee's maintenance responsibilities and does not preclude cultural events when authorized by the MCD. The Ramleela is conducted with explicit permissions, aligning with the MoU's overarching goal of public access and Park preservation. The Applicant's narrow reading of the MoU ignores the MCD's authority to permit events that enhance community welfare, provided environmental norms are met. The Committee's compliance with both the MoU and event-specific approvals ensures that the Ramleela is a legitimate activity, rendering the Applicant's ground untenable.

26. The contents of Para 17(J) are denied in toto. The Applicant's claim that the Ramleela is held without permissions from the MCD, Fire Department, Traffic Police, or Delhi Police is demonstrably false. The Committee meticulously obtains all requisite approvals annually, as evidenced by permissions spanning 2006 to 2024. These approvals cover fire safety, public order, traffic management, and environmental compliance, ensuring a holistic regulatory framework. The Applicant's assertion is a baseless assumption, unsupported by any counter-evidence. The MCD's rigorous permitting process, coupled with the Committee's diligence, guarantees that the Ramleela adheres to all statutory requirements. The Applicant's attempt to cast doubt on these permissions is a frivolous challenge to an established and transparent process.

27. The contents of Para 17(K) are denied in toto. The Applicant's alarmist claim that the Ramleela poses a "grave danger" due to effigy-burning near a power substation and gas pipeline is false and unsupported. It is submitted that the Dussehra effigy are placed far away from the power station. The Dussehra effigy-burning is conducted with stringent safety protocols, under Fire Department supervision, and with NOCs ensuring compliance. The site is carefully selected to avoid proximity to sensitive infrastructure, and fire tenders are stationed on-site to mitigate any risk. In over 70 years, no incident has occurred, underscoring the efficacy of these measures. The Applicant's speculative scenario of a mishap ignores the Committee's

impeccable safety record and the MCD's oversight. The presence of parked vehicles or a narrow road is irrelevant, as traffic and access are managed by the Police. The Applicant's ground is a hyperbolic attempt to sensationalize a well-regulated cultural practice.

28. The contents of Para 17(L) are denied in toto. The Applicant's allegations of tree destruction, gate removal, and indiscriminate waste disposal are categorically false. The Committee uses temporary structures for the Ramleela, which are installed and dismantled without causing permanent damage to the Park's greenery or infrastructure. No trees or plants are harmed, and any minor adjustments are restored post-event. Waste management is systematic, with dedicated cleanup ensuring the Park's pristine condition. The Applicant's claims of environmental neglect are contradicted by photographic evidence of the Park's upkeep. The presence of a power substation and gas pipeline is irrelevant, as safety measures, including Fire Department approvals, eliminate any risk. The Applicant's portrayal of the Ramleela as an ecological disaster is a baseless exaggeration, designed to mislead rather than inform.

29. The contents of Para 17(M) are denied in toto. The Applicant's assertion that the Ramleela curtails the Park's role as a recreational "lung" for residents is misconceived. The event lasts only 10 days, leaving the Park accessible for recreational use for the remaining 355 days of the year. Post-event restoration ensures that the Park's ecological and aesthetic functions

are fully preserved. The Applicant's claim that residents are deprived of recreational space is an overstatement, as the temporary use for a culturally significant event does not undermine the Park's primary purpose. Judicial pronouncements, including *M.C. Mehta* (supra), permit such limited use, recognizing the balance between recreation and community traditions. The Applicant's attempt to elevate a brief, regulated event into a permanent disruption is legally and factually untenable.

30. The contents of Para 17(N) are denied in toto. The Applicant's suggestion that the Ramleela should be shifted to D Park, a larger venue 300 meters away, is neither mandated nor justified. Jawahar Park has hosted the Ramleela since 1954, a tradition deeply rooted in the community's cultural identity, with continuous MCD approvals. The choice of venue is a matter of administrative discretion, and the MCD's decision to permit the event at Jawahar Park reflects its suitability and historical significance. D Park's size or accessibility does not render Jawahar Park's use unlawful or inappropriate. The Applicant's proposal ignores the Ramleela's entrenched association with the Park and the Committee's compliance with environmental and safety norms. Forcing a shift would disrupt a cherished tradition without any legal or practical basis, making the Applicant's ground meritless.

31. The contents of Para 17(O) are denied in toto. The Applicant's claim that the MCD acted arbitrarily by executing the MoU with the Committee

without considering their adoption application is baseless. The MoU dated 25.08.2021, renewed on 24.10.2024, was a lawful exercise of MCD's powers, based on the Committee's proven track record of maintaining the Park. The Applicant's allegation of surreptitious conduct is baseless as the MoU process followed MCD's adoption guidelines. The Committee's maintenance efforts, including landscaping and waste management, justified the MCD's decision. The Applicant's attempt to impugn the MoU as unlawful is an overreach, lacking evidence of procedural irregularity or bias.

32. The contents of Para 17(P) are denied in toto. The Applicant's invocation of natural justice principles to challenge the MCD's rejection of their adoption application is legally unsound. The MCD's adoption process is governed by its guidelines, which do not mandate a formal hearing or reasoned order for every applicant. The MCD lawfully agreed to the Committee's MoU based on merit and performance. Administrative decisions of this nature do not require judicialized procedures unless explicitly prescribed, which is not the case here. The Applicant's claim of unfairness is speculative, ignoring the Committee's successful stewardship and the MCD's discretionary authority. The Applicant's attempt to elevate a routine administrative choice into a violation of natural justice is a misapplication of legal principles, devoid of merit.

33. The contents of Para 17(Q) are denied in toto. The Applicant's allegation that the MCD failed to act on the Committee's purported poor maintenance is false. The notice dated 21 March 2022, cited by the Applicant, was a routine communication addressed promptly by the Committee, with subsequent inspections confirming compliance. The Park's condition is satisfactory, as evidenced by the MCD's renewal of the MoU in 2024 and photographic evidence. The Applicant's reliance on the notice is selective, ignoring the Committee's corrective measures and ongoing maintenance efforts, including gardening and waste clearance. The Applicant's repetitive complaints lack specificity and fail to establish any systemic neglect. The MCD's continued trust in the Committee refutes the Applicant's narrative of inaction, rendering this ground baseless.

34. The contents of Para 17(R) are denied in toto. The Applicant's demand for cancellation of the MoU is premised on a false premise of non-compliance, which is contradicted by evidence. The Committee adheres to the MoU's terms, maintaining the Park through landscaping, plantation, and infrastructural upkeep. The 2022 notice was resolved, and no subsequent violations have been recorded. The MCD's decision to renew the MoU in 2024 reflects satisfaction with the Committee's performance, negating any basis for termination. The Applicant's call for cancellation is a disguised attempt to usurp control of the Park, unsupported by any actionable evidence of mismanagement. The Committee's compliance with the

MoU's objectives ensures the Park's preservation, making this ground wholly untenable.

35. The contents of Para 17(S) are denied in toto. The Applicant's claim that the Committee violates environmental laws and judicial directions is a bald assertion, unsupported by specifics. The Committee complies with all environmental regulations, including the Air Act, Water Act, and Noise Rules, as well as judicial pronouncements like *M.C. Mehta* (supra), through permissions and safety measures. The MoU's environmental stipulations are adhered to, with regular maintenance ensuring the Park's ecological integrity. The Applicant's vague reference to non-compliance fails to identify any concrete violation, rendering it legally deficient. The Committee's 70-year record of conducting the Ramleela without environmental harm underscores its commitment to legal and judicial standards, making this ground frivolous.

36. The contents of Para 17(T) are denied in toto. The Applicant's apprehension that the Ramleela will create a "huge nuisance" is speculative and contradicted by its lawful execution. The event is conducted with comprehensive permissions, limiting its duration to 10 days and ensuring compliance with environmental and safety norms. The Committee's waste management, noise control, and safety measures prevent any nuisance. The Applicant's portrayal of the event as disruptive ignores its cultural significance and community acceptance over decades. The MCD's

continued approvals reflect the absence of any public detriment. The Applicant's ground is a preemptive attempt to halt a legitimate tradition, lacking any basis in fact or law.

37. The contents of Para 17(U) are denied in toto. The Applicant's fear that the MCD may renew the MoU with the Committee is moot, as the renewal was lawfully executed on 24.10.2024. The decision was based on the Committee's satisfactory performance, including maintenance and compliance with the MoU's terms. The Applicant's claim of exclusion is speculative, ignoring the transparent and merit-based process that reaffirmed the Committee's role. The renewal reflects administrative prudence, not bias, rendering this ground baseless.

38. The content of Para 18-20 does not warrant any reply.

39. The Contents of Prayer are denied in toto. In view of the above submissions, it is most prayed that this Hon'ble Tribunal may be pleased to dismiss the Original Application with costs, as it is devoid of merit and based on unsubstantiated allegations.

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PLACE: NEW DELHI

## BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

## PRINCIPAL BENCH NEW DELHI

ORIGINAL APPLICATION<sup>1150</sup> NO. OF 2024

## IN THE MATTER OF:

D5 &amp; D8 RESIDENTS' WELFARE ASSOCIATION,

MODEL TOWN, NEW DELHI

... APPLICANT

VS.

HORTICULTURE DEPARTMENT OF MUNICIPAL

CORPORATION DELHI, KESHAVPURAM ZONE

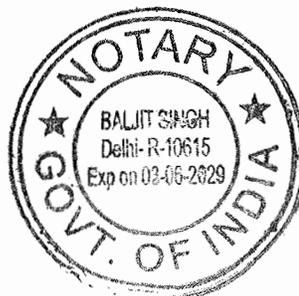
... RESPONDENT

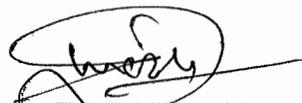
**AFFIDAVIT**

I, Dinesh Kumar Aggarwal, S/o Late Shri Om Prakash Aggarwal R/o K-3/8, Ground Floor, Model Town II, Delhi - 110009 am working as General Secretary of the Respondent No. 2 do hereby solemnly affirm and declare as under:

1. That I am well conversant with the facts of the aforesaid case and competent and authorized to swear this affidavit.
2. I have read the contents of the Reply and I say that the contents are true and correct and are based on the records maintained by the company in normal course of business and believed to be true and nothing material nor relevant has been concealed therefrom.

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| Book No   | 110       |
| Page No   | 71-4/6/25 |
| Serial No | 556       |



  
DEPONENT

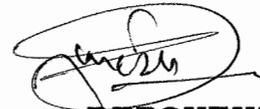
4 JUN 2025

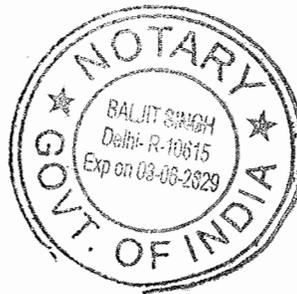
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26

**VERIFICATION:**

Verified at Delhi, on this 4 day of JUN 2025, 2025, that the contents of the above affidavit are true and correct, that no part of it is false and nothing material has been concealed therefrom.

  
**DEPONENT**



**ATTESTED**  
  
**BALJIT SINGH**  
NOTARY DELHI-R-10615  
Government of India  
NEW DELHI, Ph. - 011-43009732

|           |           |
|-----------|-----------|
| Book No   | 10        |
| Page No   | 71-4/6/25 |
| Serial No | 556       |

 4 JUN 2025

दिल्ली नगर निगम



Annexure R-1 (copy)

MUNICIPAL CORPORATION OF DELHI  
 \*HORTICULTURE DEPARTMENT\*  
 16, RAJPUR ROAD : C. L. ZONE : DELHI.

Sh. Kesho Ram Gupta,  
 Pradhan,  
 Model Town Dharmik Lilla  
 Committee (Regd).  
 D-13/A-31, Agarwal Dhamshalla,  
 Model Town, Delhi-110009.

Sub:- Reg. booking of Jawahar Park, D-Block.. for Ramlilla w.e.f.--  
23.09.2006 to 03.10.2006.

Sir,

With reference to your application dated 10/07/2006 regarding the subject cited above. In this regard, it is stated that D.C./ Civil Line Zone vide his orders dated 25/07/2006 has been pleased to grant you the permission for holding Ramlilla w.e.f. 23/09/2006 to 03/10/2006 at Jawahar Park, D-Block, Model Town.

*[Signature]*  
 31/7/06  
 Asstt. Director (Hort.)  
 Civil Line Zone.

2321/Aon/10/11/06  
 31/7/06

**MUNICIPAL CORPORATION OF DELHI****\*HORTICULTURE DEPARTMENT\*****16, RAJPUR ROAD: C.L. ZONE: DELHI**

Sh. Kesho Ram Gupta,  
Pradhan,  
Model Town Dharmik Lilla  
Committee (Regd.)  
D-13/A-31, Agarwal Dharmshalla,  
Model Town, Delhi – 110009.

Sub:- Reg. booking of Jawahar Park, D-Block, for Ramlilla w.e.f. – 23.09.2006  
to 03.10.2006.

.....

Sir,

With reference to your application dated 10/07/2006 regarding the subject cited above. In this regard, it is stated that D.C./Civil Line Zone vide his orders dated 25/07/2006 has been pleased to grant you the permission for holding Ramlilla w.e.f. 23/09/2006 to 03/10/2006 at Jawahar Park, D-Block, Model Town.

Sd/-31/7/06

Asstt. Director (Hort.)

Civil Line Zone

388

MUNICIPAL CORPORATION OF DELHI  
\* HORTICULTURE DEPARTMENT \*  
16, RAJPUR ROAD, C.L.ZONE, DELHI.

29

No.DDH/CLZ/07-08/

514

Dated:

12/9/07

To,

Pardhan,  
Model Town Dharmik Lila Committee (Regd.)  
D-13A/31, Aggrawal Dharmshala, Model Town,  
Delhi-110009.

Sub:- Grant of permission for Ramlilla In Jawahar Park,D-Block, Model Town.

With reference to your letter No. Nil dated: 05.09.07 regarding grant of permission for holding Ramlilla. In this regard, it is stated that DC/CLZ vide his orders dated: 07.09.07 has been pleased to grant the permission for holding Ramlilla in Jawahar Park, D-Block, Model Town w.e.f.11.10.07 to 22.10.07 free of charge. It is also mentioned that no commercial activity will be allowed during this period in the park.

  
12/9/07  
Dy. Director(Hort.)  
Civil Line Zone

MUNICIPAL CORPORATION OF DELHI  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

No. DDH/CLZ/08-09/ 989

Dated 18/2/08

To,

Sh. Ram Kishore Goyal  
Pardhan,  
Model Town Dharmik Leela Committee,  
D-13A/31, Aggrawal Dharamshala,  
Model Town, Delhi-110009.

Sub: Grant of Permission for Ramlila in Jawahar Park, D-Block, Model Town.

With reference to your letter No. Nil dated 29.07.08 regarding grant of permission for holding Ramleela. In this regard, it is stated that DC/CLZ vide his orders dated 08.08.08 has been pleased to grant the permission for holding Ramleela in Jawahar Park, D - Block, Model Town w.e.f. 28.09.08 to 10.10.08 free of charge. It is also mentioned that no commercial activity will be allowed during this period in the park.

*18/2/08*  
Dy. Director(Hort.)  
Civil Line Zone

31

MUNICIPAL CORPORATION OF DELHI  
\* HORTICULTURE DEPARTMENT \*  
16, RAJPUR ROAD, CIVIL LINE ZONE, DELHI.

No.DDH/CLZ/2009-10/ 519

Dated: 29/7/09

Sh. Suresh Kumar Gupta  
President,  
Model Town Dharmik Leela Committee,  
D-13-A/31, Aggrawal Dharamshala,  
Model Town, Delhi - 110009.

Sub: Grant of Permission for Ramleela in Jawahar Market, D-Block, Model Town.

With reference to your letter Nil dated 20.07.09 regarding grant of permission for holding Ramleela. In this regard, it is stated that DC/CLZ vide his orders dated 23.07.09 has been pleased to grant the permission for holding Ramleela in Jawahar Market, D-Block, Model Town w.e.f. 19.09.09 to 29.09.09 free of charge. It is also mentioned that no commercial activity will be allowed during this period in the park.

  
Dy. Director(Hort.)  
Civil Line Zone

✓

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32

**MUNICIPAL CORPORATION OF DELHI****\*HORTICULTURE DEPARTMENT\*****16, RAJPUR ROAD: CIVIL LINE ZONE: DELHI**

No.DDH/CLZ/2009-10/ 519

Date: 29/7/09

Sh. Suresh Kumar Gupta,  
President,  
Model Town Dharmik Leela Committee,  
D-13/A-31, Agarwal Dharmshala,  
Model Town, Delhi – 110009.

**Sub:- Grant of Permission for Ramleela in Jawahar Market, D-Block,  
Model Town.**

With reference to your letter Nil dated 20.07.09 regarding grant of permission for holding Ramleela. In this regard, it is stated that DC/CLZ vide his orders dated 23.07.09 has been pleased to grant the permission for holding Ramleela in Jawahar Market, D-Block, Model Town w.e.f. 19.09.09 to 29.09.09 free of charge. It is also mentioned that no commercial activity will be allowed during this period in the park.

Sd/-

Dy. Director (Hort.)

Civil Line Zone

392

MUNICIPAL CORPORATION OF DELHI  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

33

No. ADH/CLZ/10-11/763

Dated 23/8/10

President  
Model Town Dharmik Leela Committee  
D-13A/31, Aggrwal Dharam Shala  
Model Town Delhi-110009

Sub: Grant of Permission for holding Ramleela in Jahawar Park D-block  
Model Town-III w.e.f. 08.10.2010 to 18.10.2010.

With reference to letter No. Nil dated 06.08.10 regarding grant of permission for holding Ramleela in Jahawar Park D-block Model Town-III. In this regard, it is stated that DC/CLZ vide his orders dated 19.08.10 has been pleased to grant the permission for holding Ramleela in Jahawar Park D-block Model Town-III w.e.f. 08.10.2010 to 18.10.2010 free of charge. It is also mentioned that no commercial activity will be allowed during this period in the park.

  
Asstt. Director(Hort.)  
Civil Line Zone  
Asstt. Director (Hort.)  
Civil Line Zone, M.C.D.

393  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

34

No. ADH/CLZ/11-12/ 72

Dated 20-9-2011

✓ Sh. Suresh Kumar Gupta  
Model Town Dharmik Leela Committee  
D-13A/31, Aggrawal Dharamshala,  
Model Town, Delhi - 110009.

Sub: Grant of permission for holding Ramleela in Jawahar Park, D-Block,  
Model Town-III w.e.f. 27.09.2011 to 07.10.2011.

With referene to latter no Nil Dated 09.08.2011 regarding grant of permission for holding Ramleela in Jawahar Park, D-Block, Model Town-III. In this regard, it is stated that Commissioner, MCD vide his orders dated 03.09.2011 has been pleased to grant the permission for holding Rameleela in Jawahar Park, D-Block, Model Town-III w.e.f. 27.09.2011 to 07.10.2011. It is also mentioned that no commercial activity will be allowed during this period in the park.



Asstt. Director(Hort.)  
Civil Line Zone

394  
NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

35

No. ADH/CZ/12-13/385

Dated 20/9/12

Sh. Subhash Tayal, President  
Shri Sanatan Dharam Sabha (Regd.)  
F-14/66-67, Model Town-II, Delhi-9

Sub: Grant of permission for holding Ramleela in Jawahar Park, D-Block, Model Town-III w.e.f. 16.10.2012 to 25.10.2012.

With reference to letter no Nil Dated 07.09.2012 regarding grant of permission for holding Ramleela in Jawahar Park, D-Block, Model Town-III. In this regard, it is stated that DOH/NDMC vide his orders dated 10.09.2012 has been pleased to grant the permission for holding Rameleela in above said park w.e.f 16.10.12 to 25.10.12. It is also mentioned that no commercial activity will be allowed during this period in the park.

  
Asstt. Director (Hort.)  
Civil Line Zone

Copy to:

Concerned SO(H)

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

No. DDH/CLZ/2013/ 772

Dated 2-9-13

Sh. Suresh Gupta, President  
Model Town Dharmik Leela Committee (Regd.)  
D-13-A/31, Aggarwal Dharmshala,  
Model Town, Delhi-110009.

Sub: Grant of Permission for organizing Ramleela Mahostva at Jawahar Park, D-Block, Model Town w.e.f. 04.10.2013 to 15.10.2013

With reference to your request dated 02.08.2013 regarding the subject cited above. In this regard, it is stated that DC/CLZ has pleased to grant you permission for organizing Ramleela Mahostva at Jawahar Park, D-Block, Model Town w.e.f. 04.10.2013 to 15.10.2013. It is also requested that during the camp, no tree/plant & MCD Property should be damaged.

  
Dy. Director (Hort.)  
Civil Line Zone

Copy to:-

Concerned SO(H) for reporting any damaged

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

37

No. ADH/CLZ/14/ 1109Dated 1/8/14

Shri Suresh Gupta  
President,  
Model Town Dharmik Leela Committee(Regd.)  
F-5/11, Model Town, Delhi -9.

**Sub: Grant of Permission for Holding Ramleela Mahotsva at Jawahar Pak, D-Block, Model Town-III w.e.f. 24.09.2014 to 05.10.2014.**

With reference to letter dated 24.06.2014 regarding grant of permission for holding Ramleela Mahotsva in Jawahar Park, D-Block, Model Town-III, Delhi. In this regard, it is stated that DC/CLZ vide his orders dated 02.07.2014 has been pleased to grant the permission for religious function in above said park w.e.f. 24.09.14 to 05.10.2014. It is also mentioned that no commercial activity will be allowed during this period in the park.

  
Asstt. Director (Hort.)  
Civil Line Zone

**Copy to:-**

- 1 Concerned SO(H) for pursuing the matter.

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NORTH DELHI MUNICIPAL CORPORATION

HORTICULTURE DEPARTMENT

CIVIL LINE ZONE

No. ADH/CLZ/14/1109

Dated: 01.08.2014

Shri Suresh Gupta  
President,  
Model Town Dharmik Leela Committee (Regd.),  
F-5/11, Model Town, Delhi – 9.

**Sub: Grant of Permission for Holding Ramleela Mahotsva at Jawahar Park, D-Block, Model Town-III w.e.f. 24.09.2014 to 05.10.2014.**

With reference to letter dated 24.06.2014 regarding grant of permission for holding Ramleela Mahotsva in Jawahar Park, D-Block, Model Town-III, Delhi. In this regard, it is stated that DC/CLZ vide his orders dated 02.07.2014 has been pleased to grant the permission for religious function in above said park w.e.f. 24.09.14 to 05.10.2014. It is also mentioned that no commercial activity will be allowed during this period in the park.

Sd/-  
Asstt. Director (Hort.)  
Civil Line Zone

**Copy to:**

1. Concerned SO(H) for pursuing the matter.

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

No. Addl.Dir(H)/CLZ/15/ 51)

Dated 11-8-15

To,

Shri Suresh Gupta, President  
Model Town Dharmik Leela Committee(Regd.)  
Ramleela Park, D-Block, Model Town-III  
Delhi - 110009.

Sub: Grant of Permission for Ramleela Mahotsav at Jawahar park, D-Block, Model Town-III Delhi w.e.f. 12.10.2015 to 24.10.2015.

With reference to letter dated 20.07.2015 regarding grant of permission for holding Ramleela Mahotsav in above said park. In this regard, it is stated that DC/CLZ vide his orders dated 27.07.2015 has been pleased to grant the permission for holding ramleela programme in above said park w.e.f. 12.10.2015 to 24.10.2015, subject to necessary permission/ NOC from Police/Traffic Police etc.

  
Addl. Director(Hort.)  
Civil Line Zone

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**NORTH DELHI MUNICIPAL CORPORATION****HORTICULTURE DEPARTMENT****CIVIL LINE ZONE**

No. Addl. Dir(H)/CLZ/15/ 511

Date: 11/8/15

Shri Suresh Kumar Gupta, President,  
Model Town Dharmik Leela Committee (Regd.),  
Ramleela Park, D-Block, Model Town - III  
Delhi - 110009.

**Sub:- Grant of Permission for Ramleela Mahotsav at Jawahar Park, D-Block, Model Town-III Delhi w.e.f. 12.10.2015 to 24.10.2015.**

With reference to letter dated 20.07.2015 regarding grant of permission for holding Ramleela Mahotsav in above said park. In this regard, it is stated that DC/CLZ vide his orders dated 27.07.2015 has been pleased to grant the permission for holding ramleela programme in above said park w.e.f. 12.10.2015 to 24.10.2015 subject to necessary permission/NOC from Police/Traffic Police etc.

Sd/-

Addl. Director (Hort.)

Civil Line Zone

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

No. DDH/ADH/CLZ/16/ 381

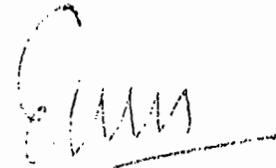
Dated 26-7-16

To,

Sh. Suresh Kr. Gupta, President  
Model Town Dharmik Leela Committee(Regd.)  
Ramleela Park, D-Block, Model Town-III  
Delhi-110009.

Sub: Grant of Permission for Holding Ramleela Programme at Jawahar Park, D-Block, Model Town w.e.f. 25.09.2016 to 14.10.2016.

With reference to letter dated 04.07.2016 regarding grant of permission for holding Religious Programme in above said park. In this regard, it is stated that DC/CLZ vide his orders dated 18.07.2016 has been pleased to grant the permission for holding religious programme in above said park w.e.f. 25.09.2016 to 14.10.2016, subject to necessary permission/ NOC from Police/Traffic Police etc and no commercial activity will be allowed during this period in the park.

  
Dy. Director(Hort.)  
Civil Line Zone

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**NORTH DELHI MUNICIPAL CORPORATION**

**HORTICULTURE DEPARTMENT**

**CIVIL LINE ZONE**

No. DDH/ADH//CLZ/16/ 381

Date: 26/7/16

Sh. Suresh Kr. Gupta, President,  
Model Town Dharmik Leela Committee (Regd.),  
Ramleela Park, D-Block, Model Town - III  
Delhi – 110009.

**Sub:- Grant of Permission for Holding Ramleela Programme at Jawahar Park, D-Block, Model Town w.e.f. 25.09.2016 to 14.10.2016.**

With reference to letter dated 04.07.2016 regarding grant of permission for holding Religious Programme in above said park. In this regard, it is stated that DC/CLZ vide his orders dated 18.07.2016 has been pleased to grant the permission for holding religious programme in above said park w.e.f. 25.09.2016 to 14.10.2016 subject to necessary permission/NOC from Police/Traffic Police etc. and no commercial activity will be allowed during this period in the park.

Sd/-

Dy. Director (Hort.)

Civil Line Zone

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
CIVIL LINE ZONE

No. DDH/ADH/CLZ/17/373

Dated 21/07/2017

To,

Sh. Sudesh Kumar Gupta, President  
Model Town Dharmik Leela Committee(Regd.)  
Ramleela Park, D-Block, Model Town-III,  
Delhi - 110009.

Sub: Grant of Permission for Holding Ramleela Mahotsav in Jawahar Park,  
Model Town-III w.e.f. 15.09.17 to 03.10.17.

With reference to letter dated 23.06.2017 regarding grant of permission for holding ramleela mahotsav in above said park. In this regard, it is stated that DC/CLZ vide his orders dated 06.07.2017 has been pleased to grant the permission for holding religious program in above said park w.e.f. 15.09.17 to 03.10.17. subject to necessary permission/ NOC from Police/Traffic Police etc. and no commercial activity will be allowed during this period in the park.

  
Dy. Director(Hort.)  
Civil Line Zone  
Deputy Director (Hort)  
Civil Line Zone

Copy to:

1 ADH/Concerned SO(H) for reporting any damage

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## NORTH DELHI MUNICIPAL CORPORATION

## HORTICULTURE DEPARTMENT

## CIVIL LINE ZONE

No. DDH/ADH//CLZ/17/ 373

Date: 21/07/2017

To,

Sh. Suresh Kumar Gupta, President,  
Model Town Dharmik Leela Committee (Regd.),  
Ramleela Park, D-Block, Model Town – III,  
Delhi – 110009.

**Sub:- Grant of Permission for Holding Ramleela Mahotsav in Jawahar Park, Model Town-III w.e.f. 15.09.17 to 03.10.17.**

With reference to letter dated 23.06.2017 regarding grant of permission for holding ramleela mahotsav in above said park. In this regard, it is stated that DC/CLZ vide his orders dated 06.07.2017 has been pleased to grant the permission for holding religious program in above said park w.e.f. 15.09.17 to 03.10.17 subject to necessary permission/NOC from Police/ Traffic Police etc. and no commercial activity will be allowed during this period in the park.

Sd/-  
Dy. Director (Hort.)  
Civil Line Zone

Copy to :

1. ADH/Concerned SO(H) for reporting any damage.

MS

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
KESHAV PURAM ZONE

NO.DDH/KPZ/2018/498

Dt. 20/08/18

**Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in  
Jawahar Park in Model Town-III w.e.f. 04/10/2018 to 22/10/2018.**

On your request on the subject cited above, the Dy. Commissioner, Keshav Puram Zone has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town-III w.e.f. 04/10/2018 to 22.10.2018.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/saplings of the park and if any will be replanted by the Committee and there will be no commercial activity in the park.

The permission granted with condition committee will submit NOC from Fire Department & Police Department before function/program.

Dy. Director (Hort.)  
Keshav Puram Zone

Sh. Suresh Kumar Gupta President  
Model Town Dharmik Leela Committee (Regd.)  
Ramlila Park, D-Block, Model Town,  
Delhi - 110009.

Dy. Director (Hort.)  
Keshav Puram Zone  
North Delhi Municipal Corporation

Twentyred City

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## NORTH DELHI MUNICIPAL CORPORATION

## HORTICULTURE DEPARTMENT

## KESHAV PURAM ZONE

No. DDH/KPZ/2018/ 498

Date: 20/08/18

**Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in Jawahar Park, in Model Town-III w.e.f. 04/10/2018 to 22/10/2018.**

On your request on the subject cited above, the Dy. Commissioner, Keshav Puram Zone has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town –III w.e.f. 04/10/2018 to 22.10.2018.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/saplings of the park and if any will be replanted by the Committee and there will be no commercial activity in the park.

The permission granted with condition committee will submit NOC from Fire Department & Police Department before function/program.

Sd/-  
Dy. Director (Hort.)  
Keshav Puram Zone

Sh. Suresh Kumar Gupta, President,  
Model Town Dharmik Leela Committee (Regd.),  
Ramlila Park, D-Block, Model Town,  
Delhi – 110009.

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NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
KESHAV PURAM ZONE

47

NO. DDH/KPZ/2019-20/375

Dt. 22/7/2019

**Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in  
Jawahar Park in Model Town-III w.e.f. 23/09/2019 to 11/10/2019.**

On your request on the subject cited above, the Hon'ble Commissioner, North DMC has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town-III; w.e.f. 23/09/2019 to 11/10/2019.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/saplings of the park and if any will be replanted by the Committee and there will be no commercial activity in the park.

The permission granted with condition committee will submit NOC from Fire Department & Police Department before function/program.

  
Dy. Director (Hort.)  
Keshav Puram Zone  
Dy. Director (Hort.)  
Keshav Puram Zone  
North Delhi Municipal Corporation

  
Sh. Suresh Kumar Gupta President  
Model Town Dharmik Leela Committee (Regd.)  
Ramlila Park, D-Block, Model Town,  
Delhi - 110009.

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## NORTH DELHI MUNICIPAL CORPORATION

## HORTICULTURE DEPARTMENT

## KESHAV PURAM ZONE

No. DDH/KPZ/2019-20/375

Date: 22/07/2019

**Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in Jawahar Park, in Model Town-III w.e.f. 23/09/2019 to 11/10/2019.**

On your request on the subject cited above, the Hon'ble Commissioner, North DMC has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town -III w.e.f. 23/09/2019 to 11/10/2019.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/saplings of the park and if any will be replanted by the Committee and there will be no commercial activity in the park.

The permission granted with condition committee will submit NOC from Fire Department & Police Department before function/program.

Sd/-  
Dy. Director (Hort.)  
Keshav Puram Zone

Sh. Suresh Kumar Gupta, President,  
Model Town Dharmik Leela Committee (Regd.),  
Ramlila Park, D-Block, Model Town,  
Delhi - 110009.



उत्तरी दिल्ली नगर निगम

NORTH DELHI MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
KESHAV PURAM ZONE

'Room No. 206, IInd Floor, B-2 Primary School Opp.  
Keshav Puram Thana, K.P.Zone, Delhi - 110035

No. SM/DDH/ADH/KPZ/2021-22

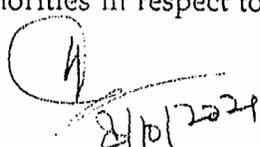
Dated :- 08/10/2021

Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in Jawahar Park in Model Town-III w.e.f. 07/10/2021 to 16/10/2021.

On your request on the subject cited above, the Hon'ble Commissioner, North DMC has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town-III w.e.f. 07/10/2021 to 16/10/2021.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/sapling of the park and if any will be replanted by the committee and there will be no commercial activity in the park.

The permission granted subject to NOC from Police & Fire Department and follows the guidelines issued by DDMA or other authorities in respect to COVID-19.

  
Deputy Director (Hort.)  
Keshav Puram Zone



Dy. Dir. (Hort.)  
Keshav Puram Zone  
North DMC

Sh. Suresh Kumar Gupta President  
Model Town dharmik Leela Committee (Regd.)  
Ramlila Park, D-Block, Model Town,  
Delhi - 110009.

MUNICIPAL CORPORATION  
HORTICULTURE DEPARTMENT  
KESHAV PURAM ZONE

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NO. 421 /DDH/KPZ/MCD/2022

Dt. 19/7/2022

**Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in  
Jawahar Park in Model Town-III w.e.f. 20/09/2022 to 09/10/2022.**

On your request on the subject cited above, the Dy. Commissioner, Keshav Puram Zone has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town-III w.e.f. 20/09/2022 to 09/10/2022.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/saplings of the park and if any will be replanted by the Committee and there will be no commercial activity in the park.

The permission granted with condition committee will submit NOC from Fire Department & Police Department before function/program and follow the guidelines issued by DDMA or other authorities in respect to COVID-19.

**Sh. Suresh Kumar Gupta President**  
Model Town Dharmik Leela Committee (Regd.)  
Ramlila Park, D-Block, Model Town,  
Delhi – 110009.

  
**Dy. Director (Hort.)**  
**Keshav Puram Zone**  
Dy. Director (Hort.)  
Keshav Puram Zone  
Municipal Corporation of Delhi

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MUNICIPAL CORPORATION

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HORTICULTURE DEPARTMENT

KESHAV PURAM ZONE

No. 421/DDH/KPZ/MCD/2022

Dated: 19.07.2022

**Sub:- Permission for holding Religious Program/Ramlila & Dussehra Mahotsav in Jawahar Park in Model Town-III w.e.f. 20/09/2022 to 09/10/2022.**

On your request on the subject cited above, the Dy. Commissioner, Keshav Puram Zone has granted necessary permission to Model Town Dharmik Leela Committee (Regd.) to holding Religious Function/Ramlila & Dussehra Mahotsav in Jawahar Park, Model Town-III w.e.f. 20/09/2022 to 09/10/2022.

The permission is granted on the undertaking of the Model Town Dharmik Leela Committee (Regd.) that there will be no damage to the trees/saplings of the park and if any will be replanted by the Committee and there will be no commercial activity in the park.

The permission granted with condition committee will submit NOC from Fire Department & Police Department before function/program and follow the guidelines issued by DDMA or other authorities in respect to COVID-19.

Sd/-  
Dy. Director (Hort.)  
Keshav Puram Zone

**Sh. Suresh Kumar Gupta President**  
Model Town Dharmik Leela Committee (Regd.)  
Ramlila Park, D-Block, Model Town,  
Delhi – 110009.

क्रमांक : सहा.नि.दे.उ./के.पु.क्षे./2023/499

दिनांक : 14/9/2023

श्री राजेन्द्र कुमार गुप्ता,  
माडल टाउन धार्मिक लीला कमेटी,  
रामलीला पार्क, डी-ब्लॉक, माडल टाउन-3 दिल्ली-110009

विषय :- दिनांक 01.10.2023 से 31.10.2023 तक जवाहर पार्क डी ब्लॉक माडल टाउन-3, दिल्ली-110009 में रामलीला/दशहरा के कार्यक्रम के आयोजन हेतु स्वीकृति पत्र।

इस कार्यालय के डायरी संख्या उप.नि.दे.उ./के.पु.क्षे./2023/1347 दिनांक 03.07.2023 को दिए गए आवेदन पत्र के आधार पर आपको जवाहर पार्क डी ब्लॉक माडल टाउन-3, दिल्ली-110009 पार्क में रामलीला/दशहरा कार्यक्रम के आयोजन हेतु आयुक्त महोदय दिल्ली नगर निगम की स्वीकृति दिनांक 06.09.2023 के अनुपालन में दिनांक 01.10.2023 से 31.10.2023 (31 दिन) तक रामलीला/दशहरा कार्यक्रम के आयोजन की अनुमति तथा आपके द्वारा दिए गए शपथ पत्र के आधार पर निम्न शर्तों पर प्रदान की जाती है।

1. आपके द्वारा सी.एस.बी.नं./जी.8 नं.डी.आर. 42124 दिनांक 14.09.2023 के द्वारा रुपये 1,46,320/- तथा डी.डी.संख्या 134295 दिनांक 13.09.2023, कोटक मंहिन्द्रा द्वारा रुपये 1,55,000/- (एक लाख पचपन हजार रुपये केवल) धरोहर राशि के रूप में सहित अन्य चार्जस निगम कोष में जमा करा दिए हैं।
2. आवेदक को दिनांक 01.10.2023 से 31.10.2023 तक (31 दिन) तक रामलीला/दशहरा कार्यक्रम के आयोजन की अनुमति हेतु इस शर्त के साथ दी जाएगी कि कोरोना वायरस की वैश्विक महामारी के कारण डी.डी.एम.सी., भारत सरकार, दिल्ली सरकार, दिल्ली नगर निगम एवं अन्य किसी संस्था द्वारा जारी सभी दिशा-निर्देशों का पालन अनिवार्य रूप से किया जायेगा। यदि दिशा-निर्देशों के पालन में किसी भी प्रकार की लापरवाही पाई गई, तो बिना किसी पूर्व सूचना के आपकी बुकिंग को रद्द किया जायेगा।
3. रामलीला/दशहरा कार्यक्रम के आयोजन की समाप्ति के बाद पार्क की सफाई का विशेष ध्यान रखा जाये।
4. आपके द्वारा दिया गया एफिडेविट संख्या इन-डी एल29520414594277वी दिनांक 03.07.2023 की सभी शर्तें मान्य होंगी।
5. निगम आयोजन हेतु केवल भूमि उपलब्ध कराती है और आपके द्वारा स्थानीय पुलिस, अग्निशमन विभाग, ट्रैफिक पुलिस, बी.एस.ई.एस. सहित अन्य आवश्यक अनापत्ति प्रमाण पत्र लेना अनिवार्य है यदि किसी प्रकार की दुर्घटना से जान-माल की हानि होती है तो इसकी पूरी जिम्मेदारी पूर्ण रूप से आपकी और आपकी संस्था की होगी।

6. आपकी बुकिंग केवल उपरोक्त तिथि <sup>24</sup> ~~के~~ <sup>3</sup> लिए ही मान्य होगी और कोई व्यापारिक गतिविधि नहीं की जाएगी।
7. आपके द्वारा फायर सेफटी की व्यवस्था स्वयं करनी होगी तथा साथ ही समारोह स्थल पर पोर्टेबल पानी का प्रबन्ध समुचित रूप से कराना होगा।
8. आपके द्वारा किसी भी प्रकार का प्रदूषण नहीं फैलाया जायेगा, जिसमें ध्वनि प्रदूषण भी शामिल होगा।
9. पार्क में आग नहीं जलाई जायेगी और न ही खाना आदि बनाया जायेगा।
10. आप ट्रैफिक में कोई भी व्यवधान उत्पन्न नहीं करेंगे।
11. आपके द्वारा पार्क में स्थायी/अस्थायी अनाधिकृत निर्माण नहीं किया जायेगा।
12. पार्क की रेलिंग व पेड आदि से कोई रस्सा आदि नहीं बांधा जायेगा।
13. रामलीला/दशहरा कार्यक्रम के आयोजन में टी.पी.डी.डी.एल. विभाग से आप स्वयं अपने खर्चे पर बिजली की अस्थायी रूप से व्यवस्था करेंगे
14. निगम को पूर्ण अधिकार होगा कि वह आपकी बुकिंग को बिना कारण बताए कभी भी रद्द कर सकती है।

  
सहायक निदेशक (उद्यान)  
केशव पुरम क्षेत्र  
Asstt. Director (Hort.)  
Keshav Puram Zone  
Municipal Corporation of Delhi

प्रतिलिपि :

- 1 प्रशासनिक अधिकारी, केशवपुरम क्षेत्र को सूचनार्थ तथा उपयुक्त दिनांक को किसी अन्य कार्यक्रम के लिये बुकिंग न करने हेतु।
- 2 सी.एसी.बी.इंचार्ज, केशव पुरम क्षेत्र
- 3 अतिरिक्त निदेशक (आई.टी.) दिल्ली नगर निगम को इस अनुरोध के साथ कि इस पार्क को दिनांक 01.10.2023 से 31.10.2023 तक ब्लॉक किया जाये।

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DELHI MUNICIPAL CORPORATION

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PARK DEPARTMENT, KESHAV PURAM ZONE

DELHI-110035

No.: Asst. Dir. P./K.P.Zone/2023/799  
14/9/2023

Date:

Shri Rajendra Kumar Gupta

Model Town Religious Leela Committee

Ramlila Park, D-Block, Model Town-3

Delhi-110009

Subject: Grant of permission for organising Ramlila/Dussehra programme from 01.10.2023 to 31.10.2023 at Jawahar Park, D-Block, Model Town-3, Delhi-110009.

This office has received your application vide diary No. Dy. Dir. P./K.P.Zone/2023/1347 dated 03.07.2023. Based on the same, you are hereby granted permission to organize Ramlila/Dussehra programme from 01.10.2023 to 31.10.2023 (31 days) at Jawahar Park, D-Block, Model Town-3, Delhi-110009, subject to the following conditions:

1. Deposit of Security Amount: You have deposited a sum of Rs. 1,46,320/- vide Challan No. G.8 No. D.R. 42124 dated 14.09.2023 and Rs. 1,55,000/- (One lakh fifty-five thousand only) vide D.D. No. 134295 dated 13.09.2023, Kotak Mahindra, as security deposit, along with other charges, with the Municipal Corporation of Delhi.
2. Compliance with Guidelines: You shall ensure strict compliance with all guidelines issued by DDMC, Government of India, Government of Delhi, Delhi Municipal Corporation, and any other agency, with regard to COVID-

19 pandemic. Any lapse in this regard shall result in cancellation of your booking without prior notice.

3. Cleaning of Park: You shall ensure thorough cleaning of the park after the programme.
4. Affidavit: Your affidavit No. IN-DL29520414594277V dated 03.07.2023 shall be binding on you.
5. Responsibility: The Corporation provides only the land for the programme, and you shall obtain all necessary no-objection certificates from local police, fire department, traffic police, BSES, and other agencies. You and your organization shall be fully responsible for any damage to life or property.
6. Validity of Booking: Your booking is valid only for the specified dates, and no commercial activity shall be permitted.
7. Fire Safety and Water Arrangement: You shall make arrangements for fire safety and portable water at the venue.
8. Pollution: You shall not cause any pollution, including noise pollution.
9. No Fire or Cooking: No fire shall be lit, and no cooking shall be done in the park.
10. Traffic: You shall not cause any obstruction to traffic.
11. No Unauthorized Construction: You shall not make any permanent or temporary unauthorized construction in the park.
12. Park Infrastructure: No rope or any other material shall be tied to park railings, trees, etc.

13. Electricity: You shall make arrangements for temporary electricity supply from TPDDL at your own expense.
14. Cancellation of Booking: The Corporation reserves the right to cancel your booking without assigning any reason.

Assistant Director (Parks)

Keshav Puram Zone

Municipal Corporation of Delhi

Copy to:

1. Administrative Officer, Keshav Puram Zone, for information and necessary action to ensure that the park is not booked for any other programme on the specified dates.
2. C.A.C.B. Incharge, Keshav Puram Zone.
3. Additional Director (IT), Delhi Municipal Corporation, with a request to block the park from 01.10.2023 to 31.10.2023.

क्रमांक : सहा.नि.दे.उ./के.पु.क्ष./2024/ 811

दिनांक : 28/08/2024

श्री राजेन्द्र कुमार गुप्ता  
मॉडल टाउन धार्मिक लीला कमेटी,  
रामलीला पार्क, डी-ब्लॉक, मॉडल टाउन-3 दिल्ली-110009  
विषय :- दिनांक 20.09.2024 से 19.10.2024 तक के लिए जवाहर पार्क, डी ब्लॉक मॉडल टाउन-3, दिल्ली 110009 में धार्मिक कार्यक्रम के आयोजन हेतु स्वीकृति पत्र।

इस कार्यालय के डायरी संख्या उप.नि.दे.उ./के.पु.क्ष./2023/1029 दिनांक 24.06.2024 को दिए गए आवेदन पत्र के आधार पर आपको जवाहर पार्क, डी ब्लॉक मॉडल टाउन-3, दिल्ली 110009 में धार्मिक कार्यक्रम के आयोजन हेतु आयुक्त महोदय दिल्ली नगर निगम की स्वीकृति दिनांक 31.07.2024 के अनुपालन में दिनांक 20.09.2024 से 19.10.2024(30 दिन) तक धार्मिक कार्यक्रम के आयोजन की अनुमति तथा आपके द्वारा दिए शपथ पत्र के आधार पर निम्न शर्तों पर प्रदान की जाती है।

1. आपके द्वारा सी.एस.बी.नं./जी.8 नं. डीएचजी00241 दिनांक 22.08.2024 के द्वारा रुपये 1,41,600/- तथा डी.डी.संख्या 667504 दिनांक 06.08.2024, कोटक महन्द्रा बैंक द्वारा रुपये 1,50,000/- (एक लाख पचास हजार रुपये केवल) धरोहर राशि के रूप में सहित अन्य चार्जस निगम कोष में जमा करा दिए है।
2. आवेदक को दिनांक 20.09.2024 से 19.10.2024(30 दिन) तक धार्मिक कार्यक्रम के आयोजन की अनुमति हेतु इस शर्त के साथ दी जाएगी कि कोरोना वायरस की वैश्विक महामारी के कारण डी.डी. एम.सी., भारत सरकार, दिल्ली सरकार, दिल्ली नगर निगम एवं अन्य किसी संस्था द्वारा जारी सभी दिशा-निर्देशों का पालन अनिवार्य रूप से किया जायेगा। यदि दिशा-निर्देशों के पालन में किसी भी प्रकार की लापरवाही पाई गई, तो बिना किसी पूर्व सूचना के आपकी बुकिंग को रद्द किया जायेगा।
3. धार्मिक कार्यक्रम के आयोजन की समाप्ति के बाद पार्क की सफाई का विशेष ध्यान रखा जाये।
4. निगम आयोजन हेतु केवल भूमि उपलब्ध कराती है और आपके द्वारा स्थानीय पुलिस, अग्निशमन विभाग, ट्रैफिक पुलिस, बी.एस.ई.एस. सहित अन्य आवश्यक अनापत्ति प्रमाण पत्र लेना अनिवार्य है यदि किसी प्रकार की दुर्घटना से जान-माल की हानि होती है तो इसकी पूरी जिम्मेदारी पूर्ण रूप से आपकी और आपकी संस्था की होगी।
5. आपकी बुकिंग केवल उपरोक्त तिथि के लिए ही मान्य होगी और कोई व्यापारिक गतिविधि नहीं की जाएगी।
6. आपके द्वारा फायर सेफटी की व्यवस्था स्वयं करनी होगी तथा साथ ही समारोह स्थल पर पोर्टेबल पानी का प्रबन्ध समुचित रूप से कराना होगा।
7. आपके द्वारा किसी भी प्रकार का प्रदूषण नहीं फैलाया जायेगा, जिसमें ध्वनि प्रदूषण भी शामिल होगा।
8. पार्क में आग नहीं जलाई जायेगी और न ही खाना आदि बनाया जायेगा।
9. आप ट्रैफिक में कोई भी व्यवधान उत्पन्न नहीं करेंगे।
10. आपके द्वारा पार्क में स्थायी/अस्थायी अनाधिकृत निर्माण नहीं किया जायेगा।
11. पार्क की रेलिंग व पेड आदि से कोई रस्सा आदि नहीं बांधा जायेगा।
12. रामलीला/दशहरा कार्यक्रम के आयोजन में टी.पी.डी.डी.एल. विभाग से आप स्वयं अपने खर्चों पर बिजली की अस्थायी रूप से व्यवस्था करेंगे
13. निगम को पूर्ण अधिकार होगा कि वह आपकी बुकिंग को बिना कारण बताए कभी भी रद्द कर सकती है।

  
सहायक निदेशक (उद्यान)  
केशव पुरम क्षेत्र  
Asstt. Director (Hort.)  
Keshav Puram Zone  
Municipal Corporation of Delhi

प्रतिलिपि :

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- 1 प्रशासनिक अधिकारी, केशवपुरम क्षेत्र को सूचनार्थ तथा उपयुक्त दिनांक को किसी अन्य कार्यक्रम के लिये बुकिंग न करने हेतु।
- 2 सी.एसी.बी.इंचार्ज, केशव पुरम क्षेत्र।
- 3 अतिरिक्त निदेशक (आई.टी.) दिल्ली नगर निगम को इस अनुरोध के साथ कि इस पार्क को दिनांक 20.09.2024 से 19.10.2024(30 दिन) तक ब्लॉक किया जाये।  
अनुभाग अधिकारी, केशवपुरम क्षेत्र को सूचनार्थ

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Delhi Municipal Corporation,  
Horticulture Department, Keshav  
Puram Area Delhi-110035

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Serial No. Assistant Director/K.P.A./2024/8/11

DATE: 28/08/2024

Shri Rajendra Kumar Gupta Model Town Dharmik Leela Committee,

Ramlila Park, D-Block, Model Town-3 Delhi-110009 Subject:- Approval letter for organizing religious program at Jawahar Park, Hi Block Model Town-3, Delhi 110009 from 20.09.2024 to 19.10.2024.

On the basis of the application given in this office's diary number UP.D.D.U./K.P.A./2023/1029 dated 24.06.2024, you are granted permission to organize a religious program from 20.09.2024 to 19.10.2024 (30 days) in compliance with the approval dated 31.07.2024 of the Commissioner, Municipal Corporation of Delhi for organizing a religious program at Jawahar Park, D Block, Model Town-3, Delhi 110009 and on the basis of the affidavit given by you, on the following conditions.

1. You have deposited Rs. 1,41,600/- through CSB No./G.8 No. DHG 00241 dated 22.08.2024 and Rs. 1,50,000/- (Rupees One Lakh Fifty Thousand only) as mortgage amount along with other charges in the Corporation Fund through DD No. 667504 dated 06.08.2024, Kotak Mahindra Bank.
2. The applicant will be given permission to organize a religious event from 20.09.2024 to 19.10.2024 (30 days) with the condition that due to the global pandemic of corona virus, all the guidelines issued by DDMC, Government of India, Delhi Government, Delhi Municipal Corporation and any other organization will be followed compulsorily. If any kind of negligence is found in following the guidelines, then your booking will be cancelled without any prior notice.

3. Special care should be taken to clean the park after the religious event is over.
4. The corporation only provides land for the event and you have to arrange for local police, fire brigade etc. It is mandatory to obtain necessary NOCs from the department, traffic police, BSES and other relevant departments. If any accident causes loss of life or property, the entire responsibility will be yours and your organisation's.
5. Your booking will be valid for the above date only and no trading activity will be carried out.
6. You will have to make arrangements for fire safety yourself and also make proper arrangements for portable water at the function venue.
7. You will not cause any kind of pollution, which will also include noise pollution.
8. Fire will not be lit in the park nor will food etc. be cooked.
9. You will not cause any disruption to traffic.
10. You will not make any permanent/temporary unauthorized construction in the park.
11. No rope etc. will be tied to the railings and trees of the park.
12. In organizing Ramleela / Dussehra program, you can take help from TPDDL department at your own expense will temporarily arrange for electricity
13. The Corporation shall have the right to cancel your booking at any time without assigning any reasons.

**S/D**

Assistant Director (Horticulture)

421

62

Keshav Puram Area Asstt. Director (Hort.)

Keshav Puram Zone

Municipal Corporation of Delhi

Copy:

1. Administrative Officer, Kesavuparam Area for information and not to book the above mentioned date for any other function.
2. C.A.C.B. Incharge, Keshav Puram Area.
3. Additional Director (IT) Municipal Corporation of Delhi with the request to block this park from 20.09.2024 to 19.10.2024 (30 days). For information to Section Officer, Keshavpuram area.

422

63 A22  
Annexure-R-2

INDIA NON JUDICIAL

Government of National Capital Territory of Delhi



सत्यमेव जयते

e-Stamp

|                           |  |
|---------------------------|--|
| Certificate No.           | : IN-DL13917971876627T                   |
| Certificate Issued Date   | : 23-Aug-2021 04:34 PM                   |
| Account Reference         | : IMPACC (M) d708903/DELHI/ DL-DLH       |
| Unique Doc. Reference     | : SUBIN-DL-DL70890324804483787043T       |
| Purchased by              | : Model Town Dharmik Lila Committee Regd |
| Description of Document   | : Article 5 General Agreement            |
| Property Description      | : NA                                     |
| Consideration Price (Rs.) | : 0<br>(Zero)                            |
| First Party               | : Model Town Dharmik Lila Committee Regd |
| Second Party              | : Horticulture Department North MCD      |
| Stamp Duty Paid By        | : Model Town Dharmik Lila Committee Regd |
| Stamp Duty Amount (Rs.)   | : 100<br>(One Hundred only)              |

सत्यमेव जयते



Director (Horticulture)

North Delhi Municipal Corporation

Please write or type below this line.

For Model Town Dharmik Lila Committee (Regd.)

President

MEMORANDUM OF UNDERSTANDING (AGREEMENT)

This Agreement is made on this ..... day of August 2021 between the Commissioner, North Delhi Municipal Corporation acting through Director (Horticulture), North Delhi Municipal Corporation HEREINAFTER CALLED THE NORTH DMC which expression shall unless excluded by or repugnant to the context, be deemed to include its successors in office and assigns of the one part Sh. Suresh Kumar Gupta, President, Model Town Dharmik Leela Committee, Ram Leela Park, D-Block, Model Town III, Delhi-110009 under MOU Scheme for the development and maintenance of Jawahar Park (the area of the park 0.93 acre), D-Block, Model Town III, Ward No. 77N, Keshav Puram Zone.

The agreement of MOU is based on the following standard terms and conditions which are given as under:-

1. The sponsoring/voluntary agency has formally taken possession of the below mentioned Municipal sites after demarcation w.e.f. ....in pursuance of this Memorandum of Understanding.

**(DESCRIPTION OF SITES WITH AREA)**

Development/Maintenance /Beautification/Adoption of Jawahar Park (No. of park 01, the area of the park 0.93 acre), D-Block, Model Town III, Ward No. 77N, Keshav Puram Zone by Model Town Dharmik Leela Committee (Regd), Ram Leela Park, D-Block, Model Town III, Delhi-110009

The Sponsoring/Voluntary Agency has to start the work of development/maintenance of the site/sites including (listing out the activities / job to be done in each site) within 15 days, complete the above works within three months and maintain/develop the same to the entire satisfaction of the Commissioner for a period of three Years from the date of this agreement. Each M.O.U will be reviewed after one year.

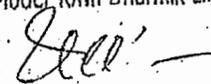
The ownership of the aforesaid premises shall continue to vest with the North DMC and shall not be transferred to the voluntary agency.

The Commissioner, North DMC reserves the right to terminate the agreement any time and resume possession of the site after giving one month's notice to the sponsoring/voluntary agency.

2. Detailed layout plan/s of the site/s prepared (on scale) and signed by the parties, is/are annexed.

Contd..3

For Model Town Dharmik Lila Committee (R)



Pre:

  
 Director (Horticulture)  
 North Delhi Municipal Corporation

65-

An inventory of existing trees/plantations, boundary walls railing, fountains and all other installations at the time of handing over of the site to the voluntary agency signed by the parties is also be annexed.

3. The Sponsoring/Voluntary Agency shall carry out all development and maintenance works in the sponsored premises in accordance with the agreed terms & conditions and such other directions as may be issued from time to time by the Commissioner, at its own expenses. Provision of water in the sponsored site will be the responsibility of North DMC except the central verges and roads.
4. The Sponsoring/Voluntary Agency shall keep the sponsored premises/sites open to the general public with only such restrictions as may be allowed by the Commissioner for ensuring cleanliness of environment, protection and security of the Municipal property and shall not use the same for any other purpose. No fee or charges will be collected by the voluntary agency from any members of the general public for entry or use of the sponsored premises.
5. The Sponsoring/Voluntary Agency shall not put up any structure for its own use within the sponsored premises. However, it shall be permitted to put-up security fencing around the adopted site provided that the designs and specifications of the fence have the prior approval of the Commissioner.
6. The Sponsoring/Voluntary Agency shall not transfer or cause to be transferred nor shall be sub-lease/sub-person/organization for maintenance.
7. The Sponsoring/Voluntary Agency shall pay to the North DMC a nominal license fee of Re. 1 per annum for each of the sponsored site/s for the duration of sponsorship.
8. The Sponsoring/Voluntary Agency shall not do anything that would cause any permanent damage to the North DMC property.
9. The North DMC will not be responsible/liable for compensation/making good any losses that may be caused by theft/fire/natural calamities/riots or any other reason whatsoever. The party shall itself be solely responsible for such losses.
10. The Sponsoring/Voluntary Agency shall abide by all the instructions/standing orders of the North DMC as well as the court orders that may be issued from time to time and shall also abide by the traffic rules while developing and maintaining the sponsored premises.

Contd.....Page-4

- 4 -

For Model Town (Pharmik) Lia Committee (F)

Director (Infrastructure)  
North Delhi Municipal Corporation

Pra

11. All sale proceeds of timber, grass and/or other produce of the said land shall be credited to North DMC. The decision of exploitation of forest produce will be taken by the North DMC as per rules in force.
12. The North DMC shall be entitled and permitted to utilize earth for repairs and to cut branches of trees and also to execute work required for normal functioning of the North DMC. No compensation shall be paid by the Corporation if any damage is caused to the assets of the voluntary agency in course of execution of such works.
13. The North DMC shall be at liberty to carry-out of its normal works in connection with the maintenance of roads, traffic signals etc. and the employees of the North DMC shall not be challenged or hindered while moving about in the performance of their duties, provided they are authorized by the Competent Authority in the North DMC to do so.
14. In case of accidents due to fall of branches of trees and such other emergencies etc., the North DMC may order cutting of trees/branches for works required in connection with the restoration of the transportation without giving any notice. No compensation shall be payable to the voluntary agency in such a case of damage.
15. The Sponsoring/Voluntary Agency will be allowed to display a '**SMALL PLAQUE**' in the sponsored premises as prescribed below:-
- "Adopted/Sponsored by (name of the sponsoring/voluntary agency with logo, if any) with the approval of the North DMC"
- (However, the size and the manner of display shall be specified in each MOU).
- No advertisement tax will be levied for display of the above mentioned small plaque.
16. Development and Maintenance works by the sponsoring/voluntary agency in the sponsored premises will be supervised and monitored by a Committee consisting of the concerned Deputy Commissioner as Chairman, the concerned Area Councillor, a Representative of the Voluntary Agency and a Representative of the concerned department, as members. The representatives of the department will function as Convener of the Committee. This Committee will inspect the site at least thrice in a year and submit its report/recommendations to the Commissioner through the concerned Head of Department. The Voluntary Agency will extend all necessary co-operation and assistance to the Committee.

Contd.....5

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For Model Town Dhamik 171a Committee (

  
 Director (Infrastructure)  
 North Delhi Municipal Corporation

17. On the expiry/in the event of termination of this agreement, all materials at site including those provided by the voluntary agency except the name plaque/logo provided by them will become the property of North DMC and the voluntary agency will have no right, claim or lien over any of these. The Corporation shall be free to clear the sites of the materials left by the voluntary agency.
18. All disputes and difference arising out of or in any way touching and concerning this agreement (except for those which are otherwise hereinbefore provided for) shall be referred to the sole arbitration of the Commissioner, North DMC or his nominee. There will be no objection to any such appointment on the ground that the arbitrator so appointed is a Government Servant/Municipal Officer and that in the course of his duty as such Government Servant/Municipal Officer he had expressed views on all or any of the matters in dispute. The award of the arbitrator so appointed shall be final and binding on the parties.

Commissioner shall be sole Arbitrator in case of any dispute.

In witness whereof the parties to these presents have hereinto set and subscribed their hands and seal on the day and the year first above written.

WITNESS:

FOR AND ON BEHALF OF THE COMMISSIONER  
NORTH DELHI MUNICIPAL CORPORATION

1.

Signature:

Director (Horticulture)

Name :

North Delhi Municipal Corporation  
Dr. Ashish Priyadarshi

Designation : Director (Horticulture), North DMC  
(With stamp) 16th Floor, E-1 Block, Civic Centre  
New Delhi-110002.

2.

FOR AND ON BEHALF MODEL TOWN DHARMIK LEELA  
COMMITTEE

Signature:

For Model Town Dharmik Leela Committee (Read)

Name : Sh. Suresh Kumar Gupta,

Designation : President,

(With stamp) Model Town Dharmik Leela Committee,  
President  
Ram Leela Park, D-Block, Model Town III,  
Delhi-110009.

427

A205

Annexure-R-3



MUNICIPAL CORPORATION OF DELHI  
HORTICULTURE DEPARTMENT, HQ  
16<sup>th</sup> FLOOR, E-1 BLOCK, SPM CIVIC CENTRE,  
MINTO ROAD DELHI-02

68

No. DOH-I/ADH/HQ/MCD/2024-25/269

Dated 24/10/24

To,

✓ Sh. Dinesh Kumar Aggarwal  
General Secretary,  
Model Town Dharmik Leela Committee  
D-Block, Model Town-III  
New Delhi-110009

**Sub: Renewal of Development/ Maintenance/ Beautification/ Adoption of Jawahar Park, D-Block, Model Town-III, Ward No. 68 in Keshav Puram Zone by Model Town Dharmik Leela Committee, D-Block, Model Town-III, Delhi-110009 under MOU Scheme.**

This has reference to your application on above cited subject, it is to inform that the proposal for the Development/Beautification/Adoption and maintenance **Jawahar Park, D-Block, Model Town-III, Ward No. 68 in Keshav Puram Zone** under MOU has been approved by the competent authority as per terms and condition of the agreement.

The agreement of MOU will be valid for the period of three year from the date of agreement & will be reviewed after one year. The sponsoring agency **Model Town Dharmik Leela Committee, D-Block, Model Town-III, Delhi-110009**, will be allowed to display a "Small Plaque" in the sponsored premises size 50 Sqft. with the prior approval of board from the MCD.

Therefore, you may contact the office of Dy. Director (Horticulture)/ Keshavpuram Zone for taking over of the physical possession of the site. In case of any query ADH/Keshavpuram Zone may contact the authorized signatory of **Dharmik Leela Committee, D-Block, Model Town-III** on 9811168200.

Asst. Director (Hort.)/HQ  
Municipal Corporation of Delhi



ARUN PANWAR  
Assistant Director (Hort.)/HQ  
Municipal Corporation of Delhi

|   |   |  |
|---|---|--|
|  | <p>MUNICIPAL CORPORATION OF DELHI<br/>HORTICULTURE DEPARTMENT, HQ<br/>16<sup>th</sup> FLOOR, E-1 BLOCK, SPM CIVIC CENTRE,<br/>MINTO ROAD DELHI-02</p> | <p>75<br/>आज़ादी का<br/>अमृत महोत्सव</p> |
|---|---|--|

No. DOH-II/ADH/HQ/MCD/2024-25/268

Dated:- 24/10/24..

To,

✓ Sh. Dinesh Kumar Aggarwal  
General Secretary,  
Model Town Dharmik Leela Committee  
D-Block, Model Town-III  
New Delhi-110009

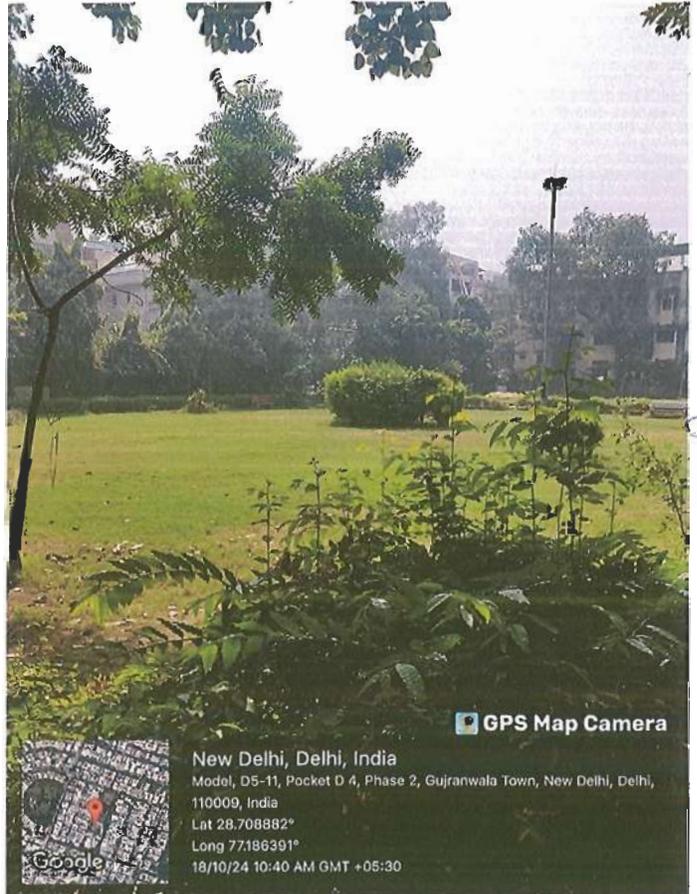
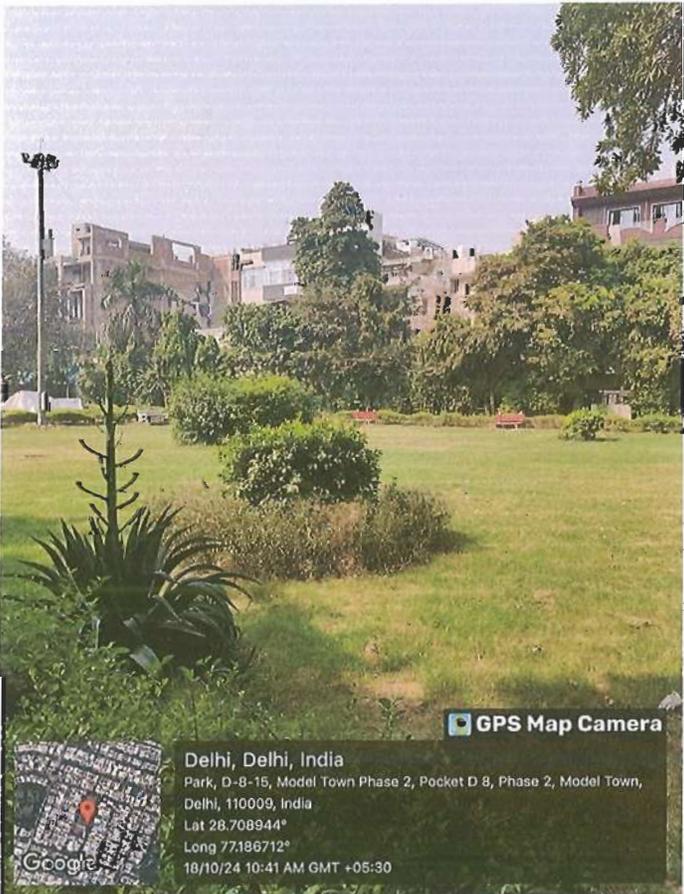
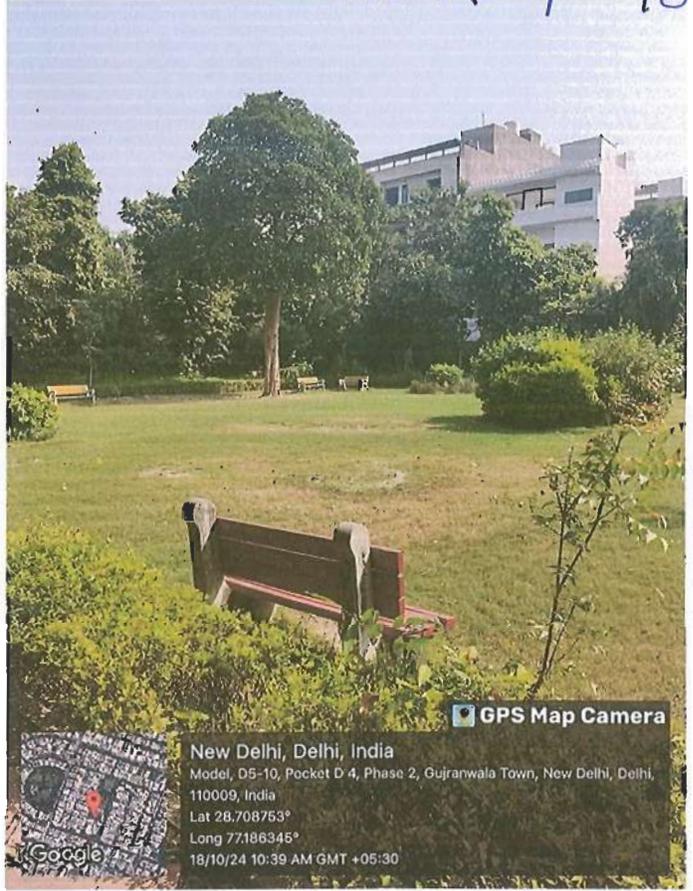
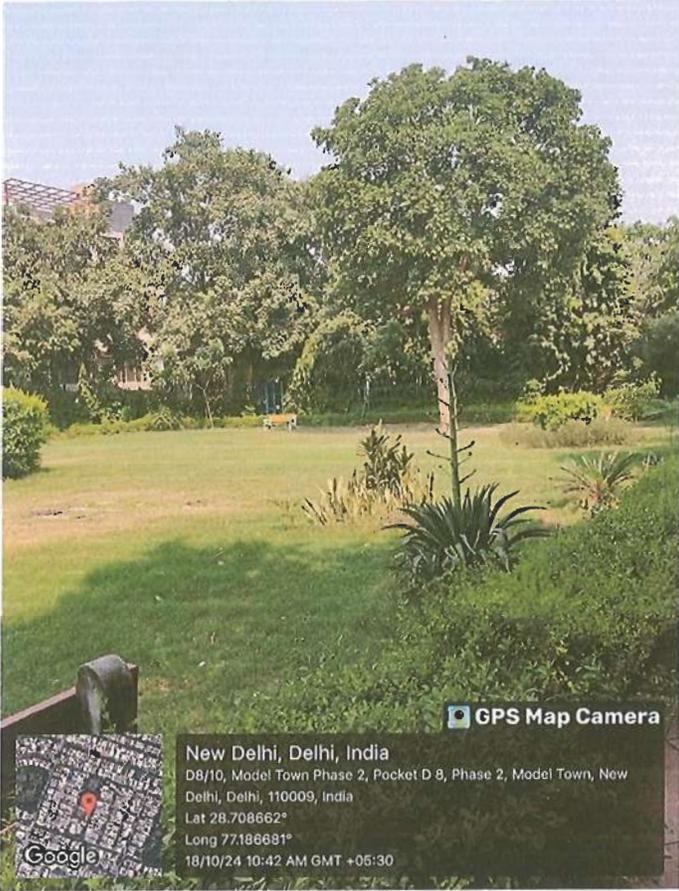
**Sub: Renewal of Development/ Maintenance/ Beautification/ Adoption of Jawahar Park, D-Block, Model Town-III, Ward No. 68 in Keshav Puram Zone by Model Town Dharmik Leela Committee, D-Block, Model Town-III, Delhi-110009 under MOU Scheme.**

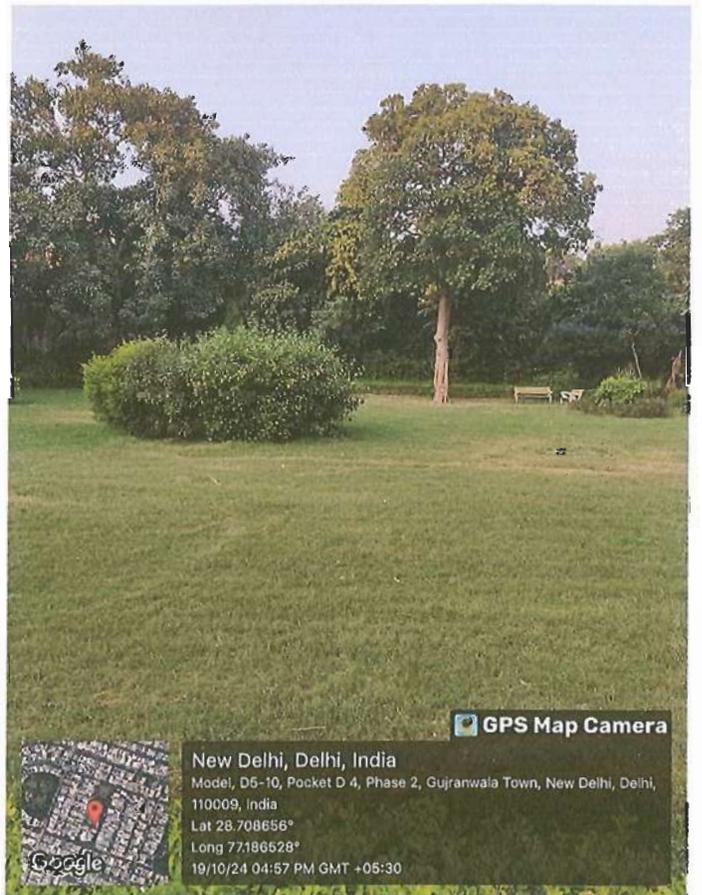
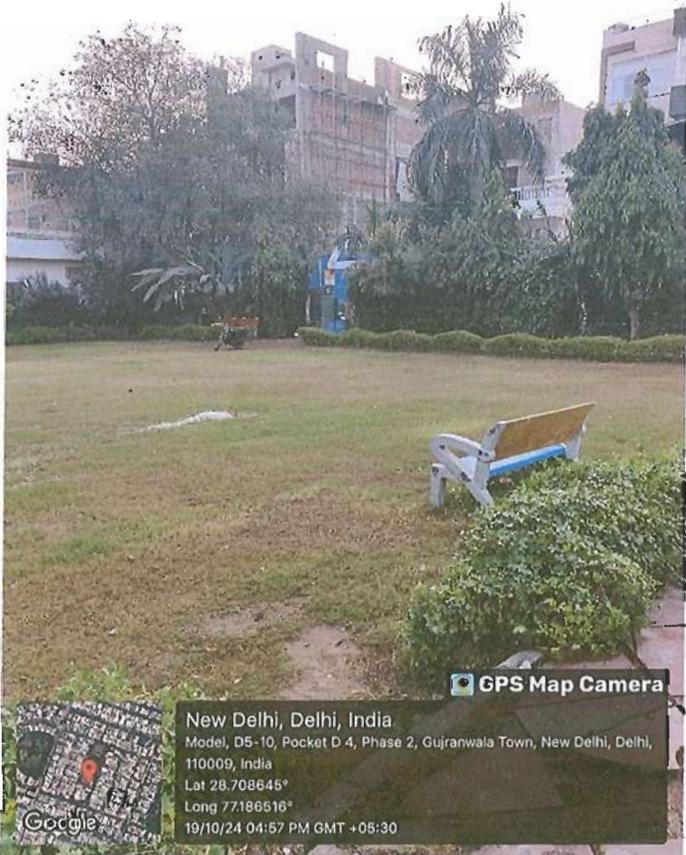
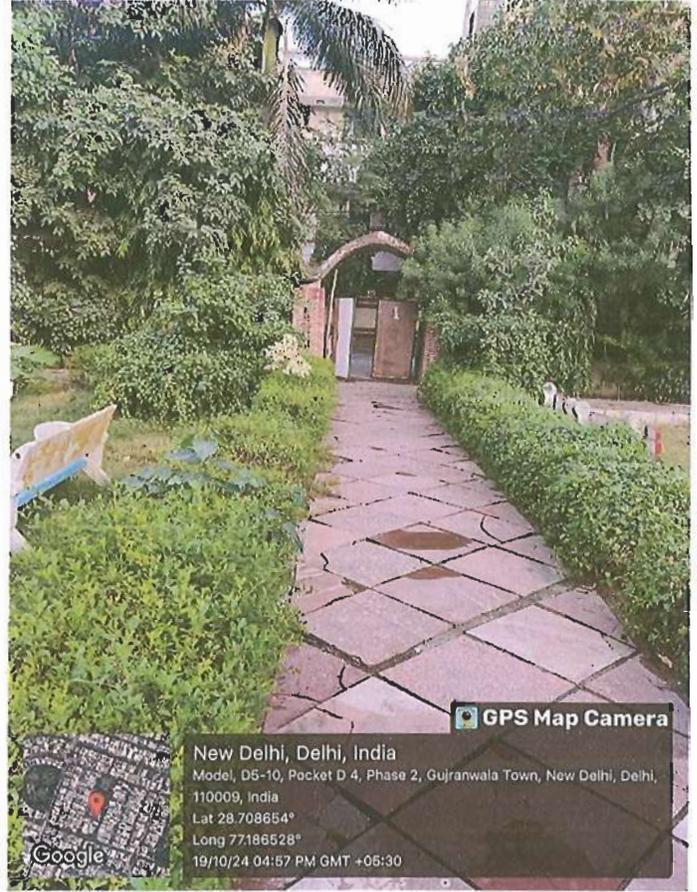
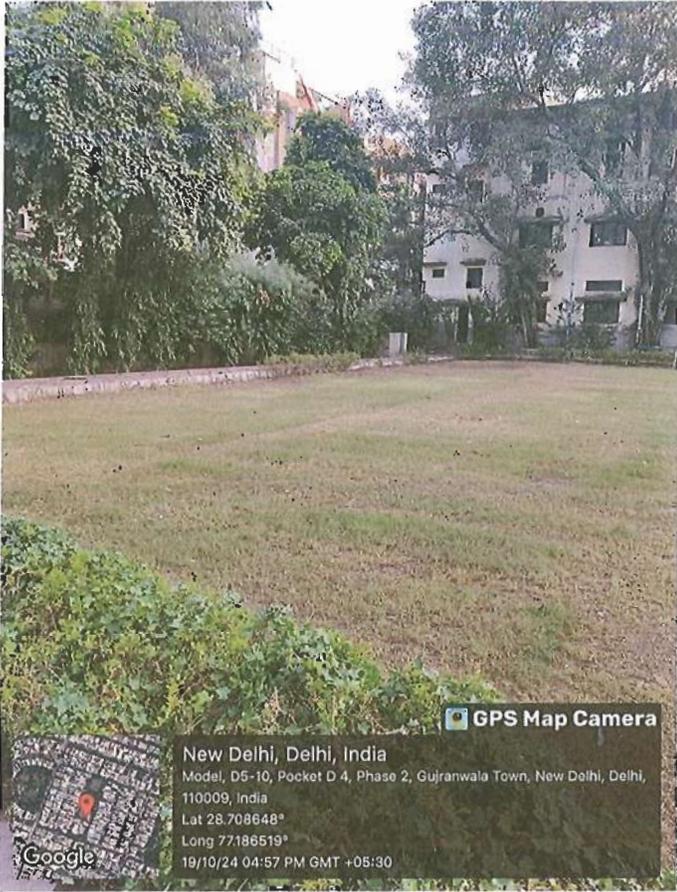
With reference to the subject matter, the case file is duly approved by the Competent Authority. In this respect, you are requested to visit the office of Director Horticulture-I, MCD, 16th floor, E-1 Block, Dr. S.P. Mukherjee, Civic Centre, New Delhi, 110002 for executing agreement with the Corporation as per latest terms and condition with 100/- Rs. Non judicial Stamp Paper, Seal of organization and designation of authorized signatory on any working day from 9.00AM to 5:30 PM. You are also requested to deposit the necessary fees of MOU.

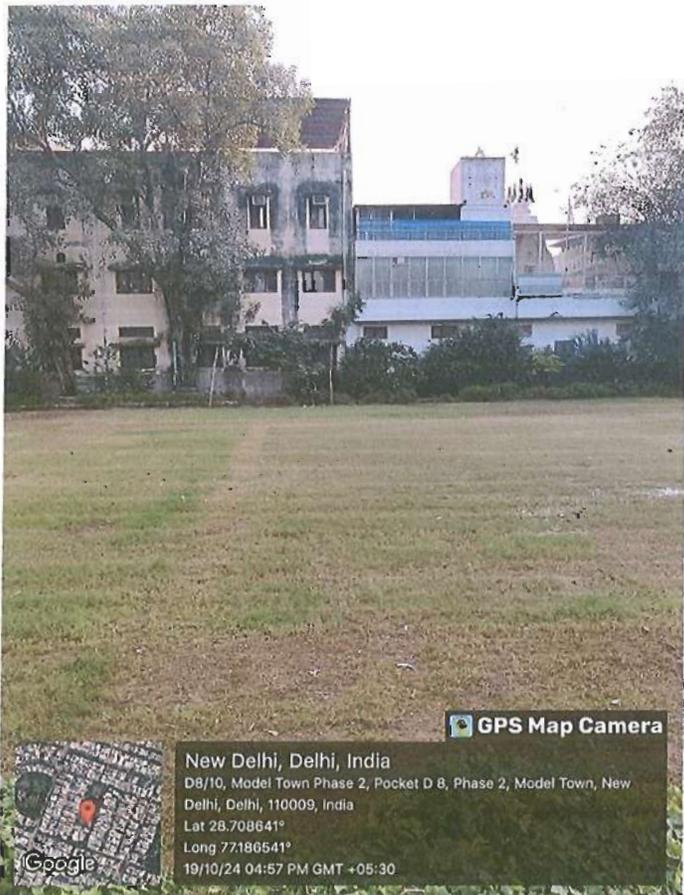
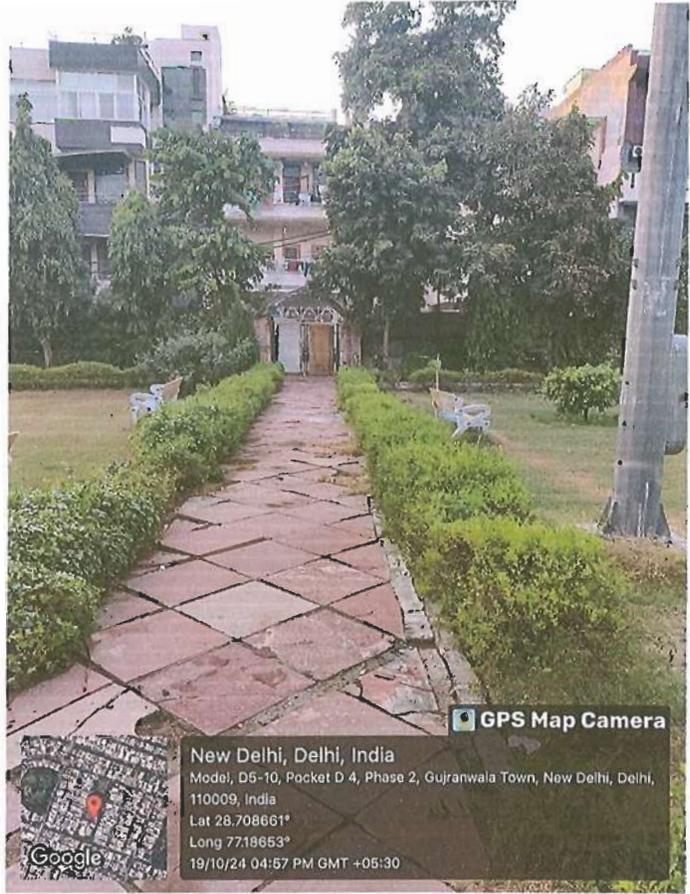
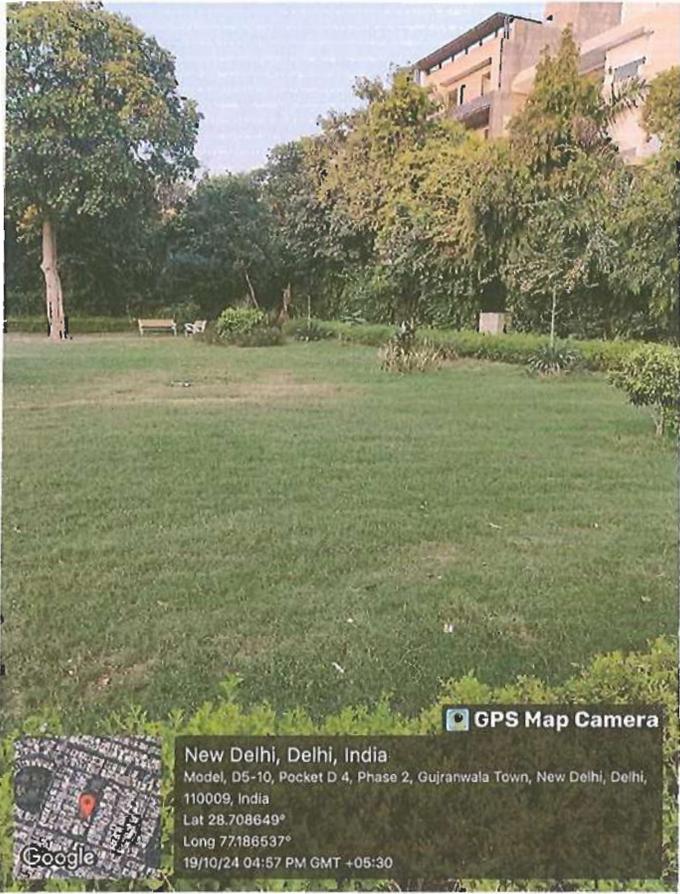
  
Asst. Director (Hort.)-I/HQ/MCD



ARUN PANWAR  
Assistant Director (Hort.)/HQ  
Municipal Corporation of Delhi









**New Delhi, Delhi, India**  
 Model, D5-10, Pocket D 4, Phase 2, Gujranwala  
 Town, New Delhi, Delhi 110009, India  
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 27/03/2025 03:59 PM GMT +05:30



**Delhi, Delhi, India**  
 D-5/9, Pocket D 4, Phase 2, Model Town, Delhi,  
 Delhi 110009, India  
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**नई दिल्ली, दिल्ली, भारत**  
 D5/9, पॉकेट D 4, फेस 2, मॉडल टाउन, नई दिल्ली, दिल्ली  
 110009, भारत  
 Lat 28.708617° Long 77.186311°  
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**New Delhi, Delhi, भारत**  
 Model, D5-10, Pocket D 4, Phase 2, Gujranwala  
 Town, New Delhi, Delhi 110009, भारत  
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**New Delhi, Delhi, India**  
 D8/10, Model Town Phase 2, Pocket D 8, Phase 2,  
 Model Town, New Delhi, Delhi 110009, India  
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**New Delhi, Delhi, India**  
 29, Model Town 3rd Main Rd, Model Town Iii,  
 Pocket C, Phase 3, Model Town, New Delhi, Delhi  
 110009, India  
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**नई दिल्ली, दिल्ली, भारत**  
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**Delhi, Delhi, India**  
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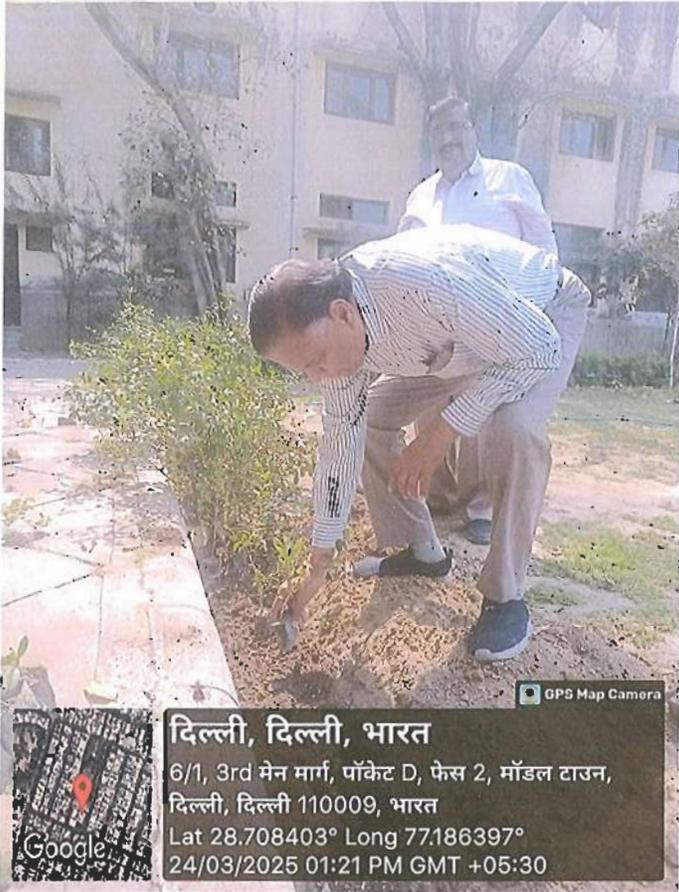
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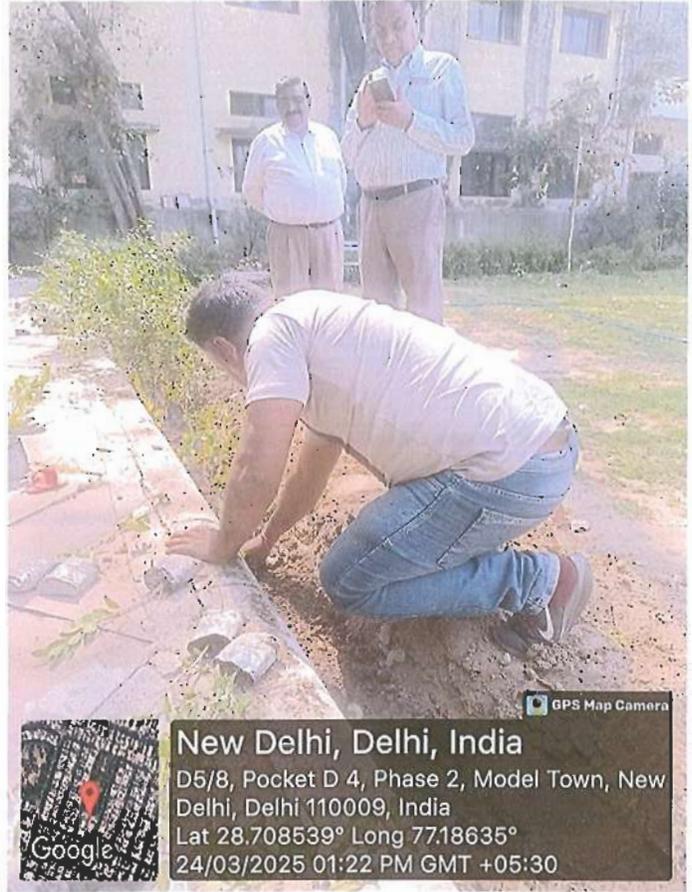
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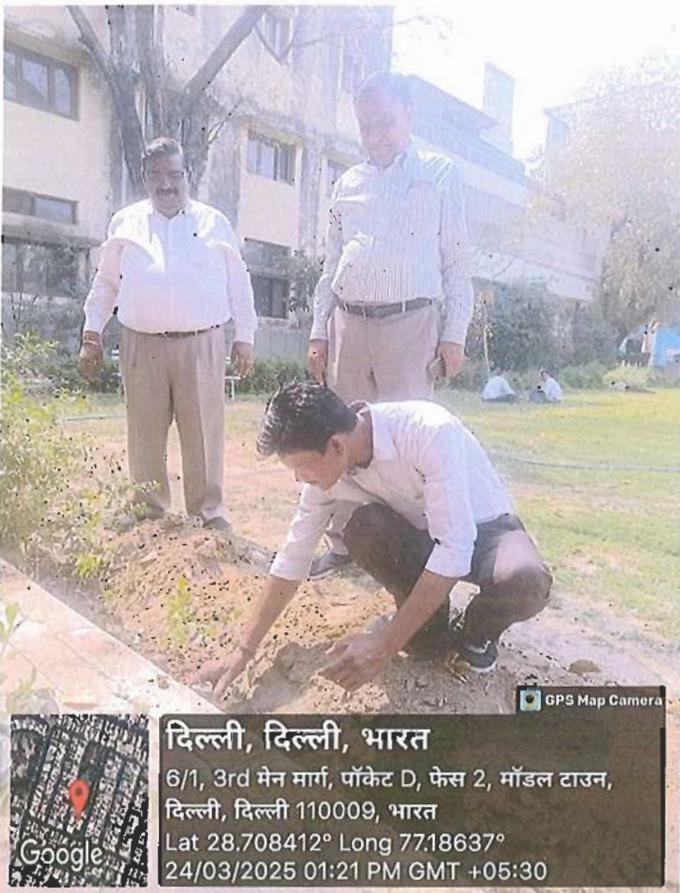
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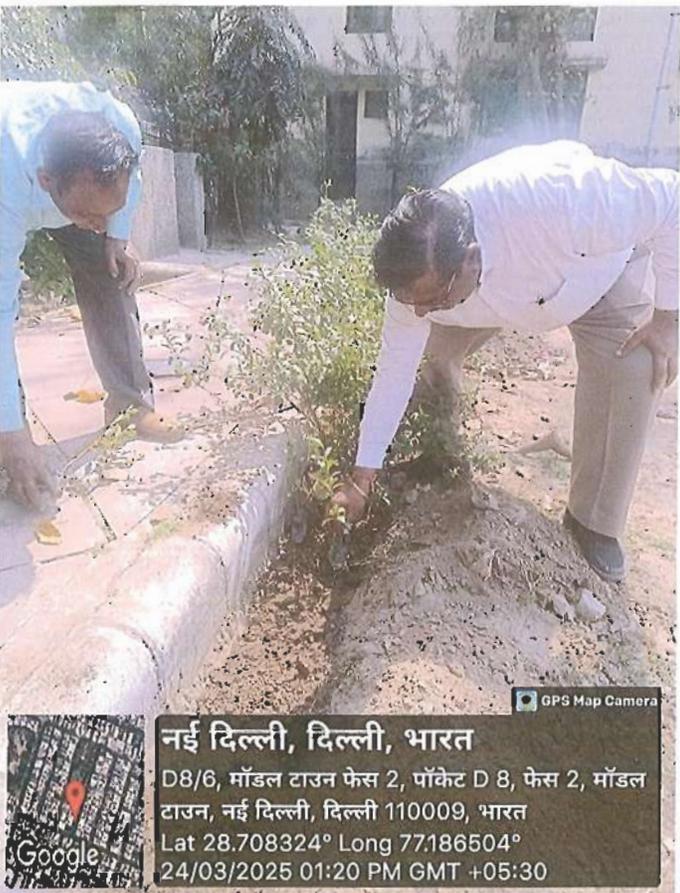
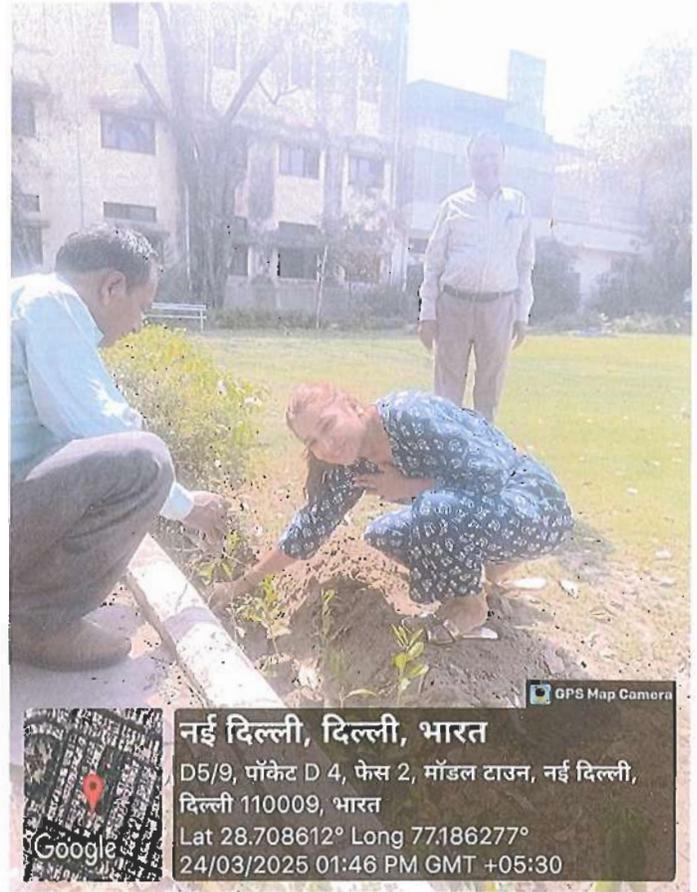
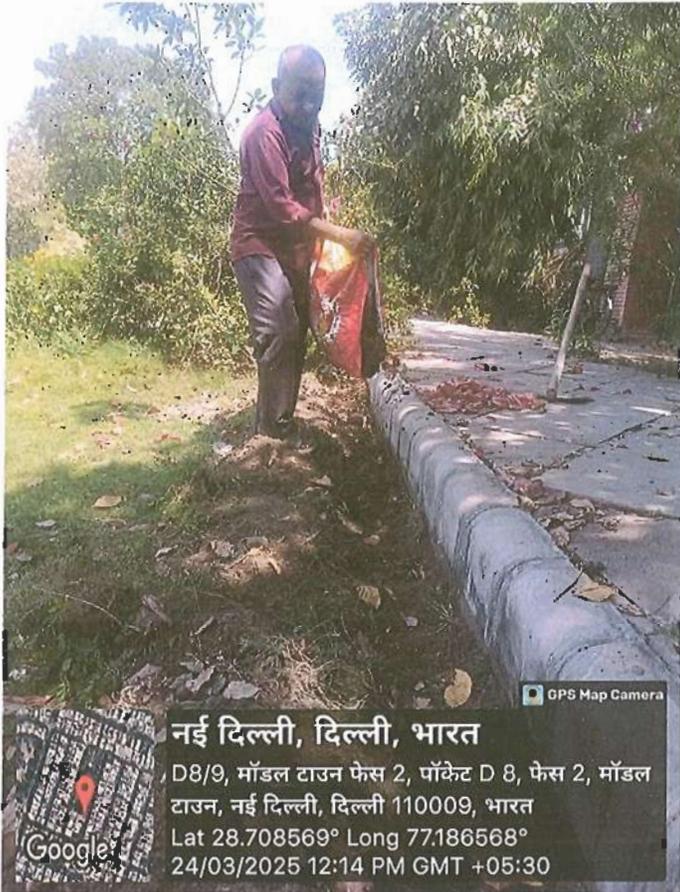
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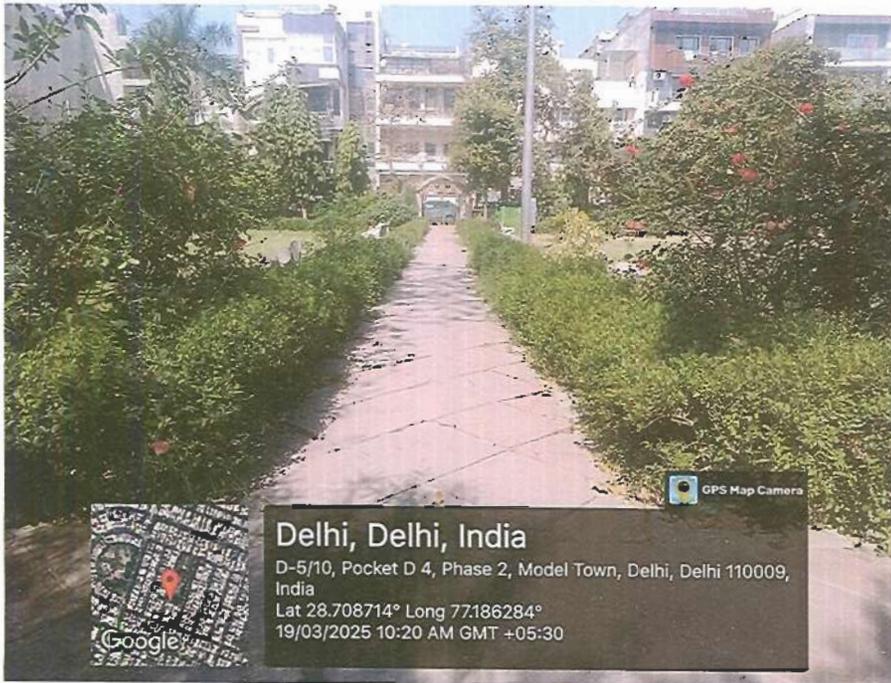
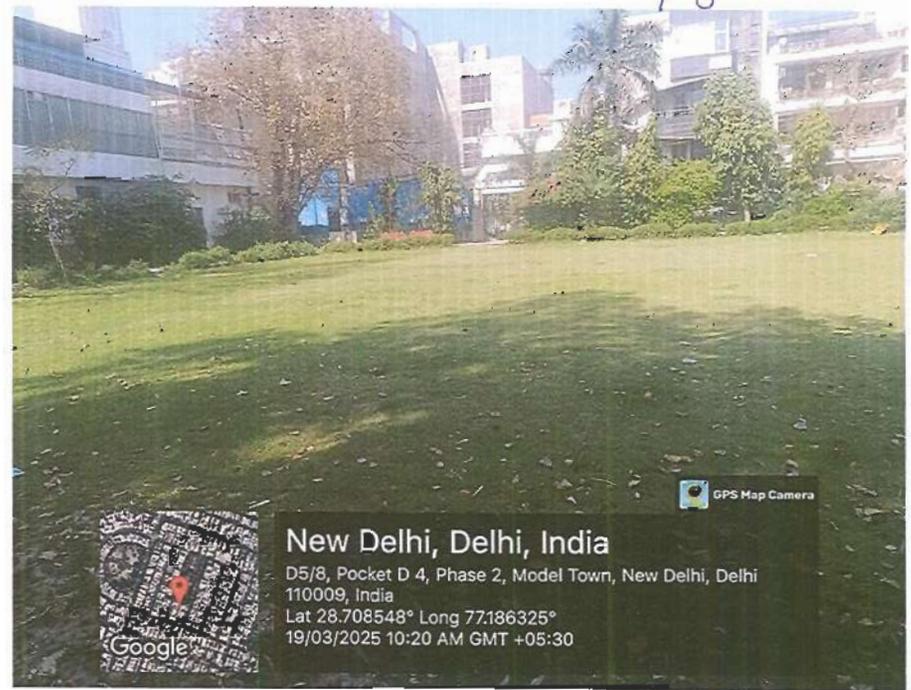
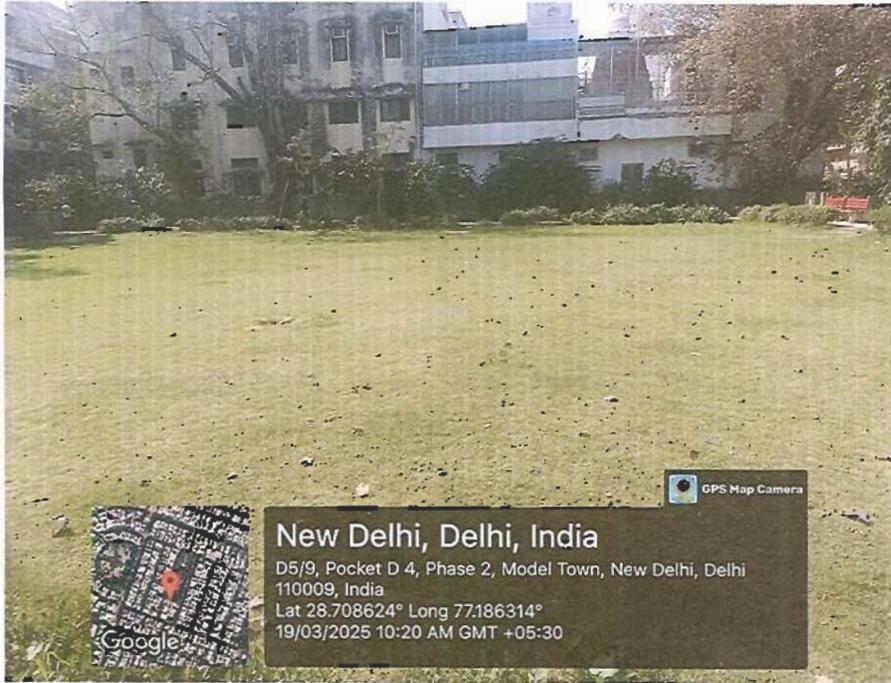


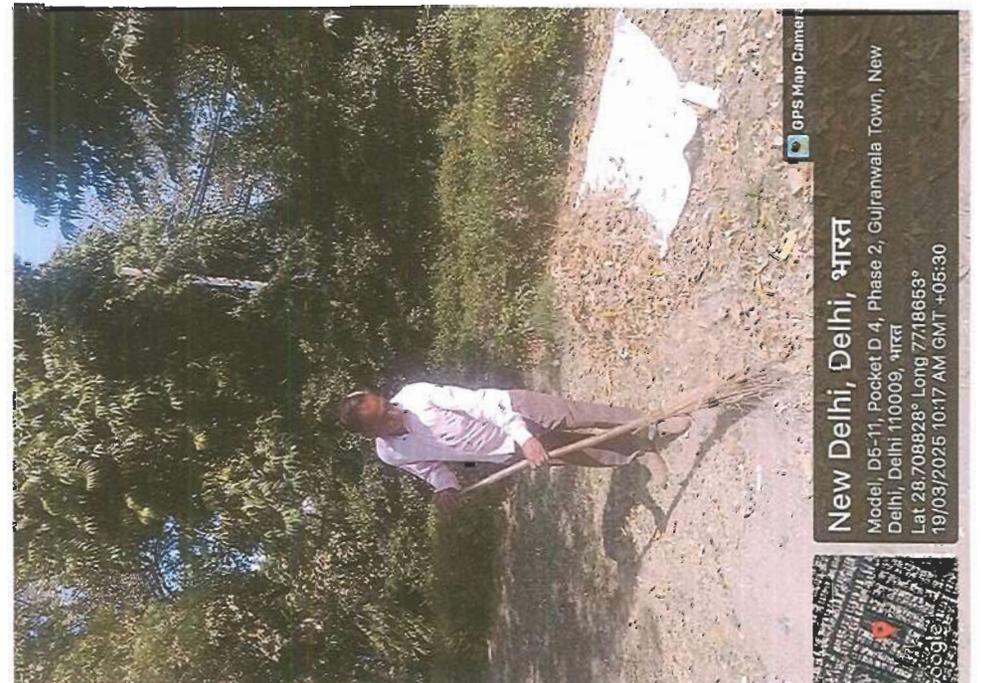
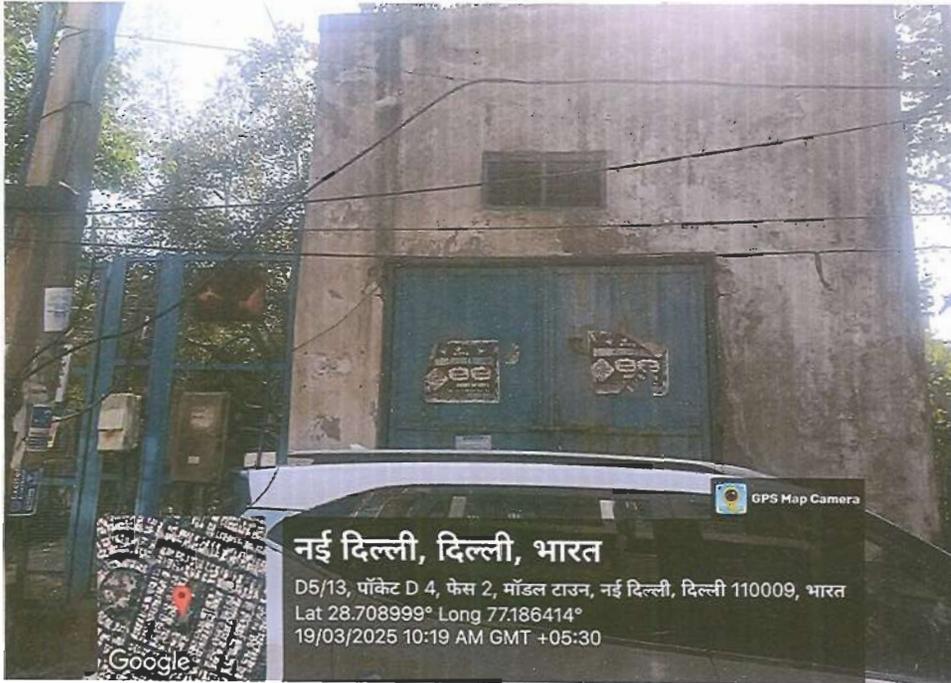
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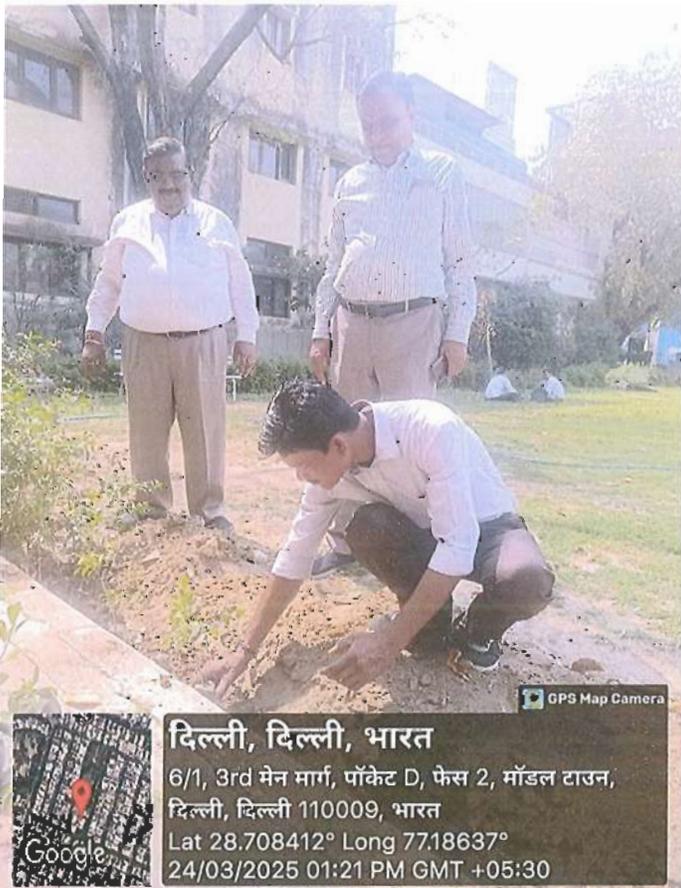
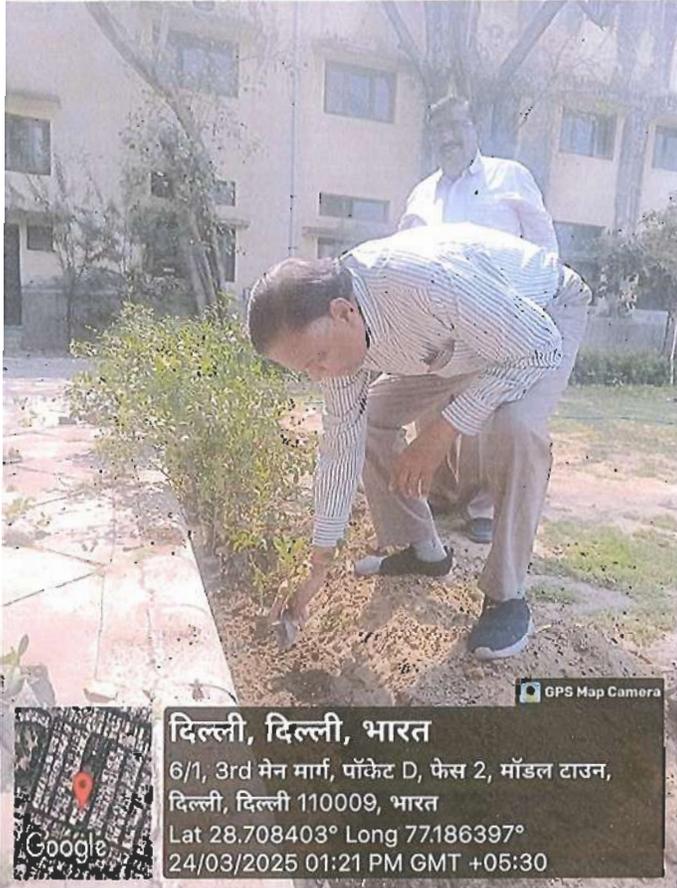


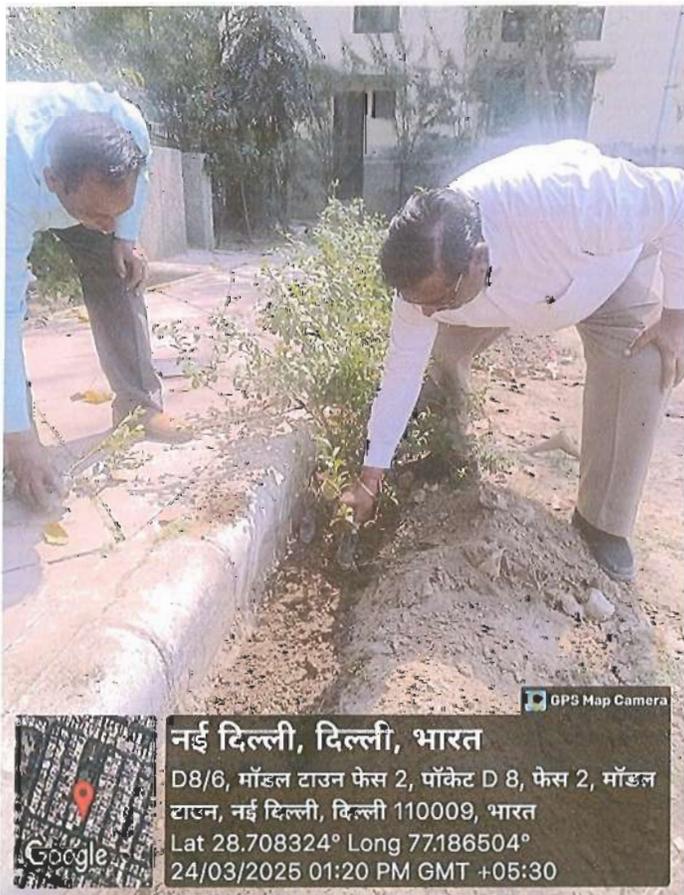
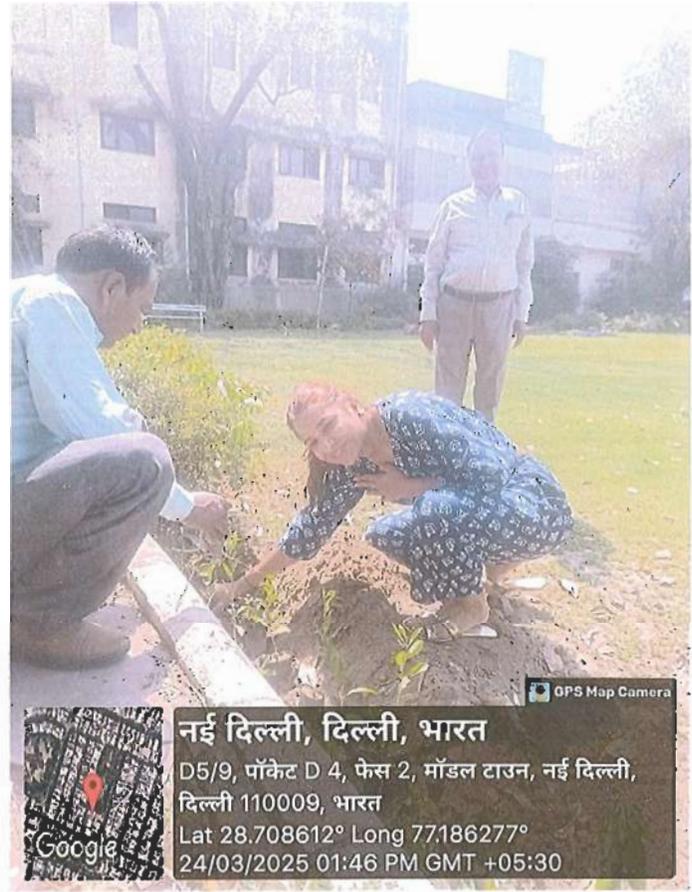
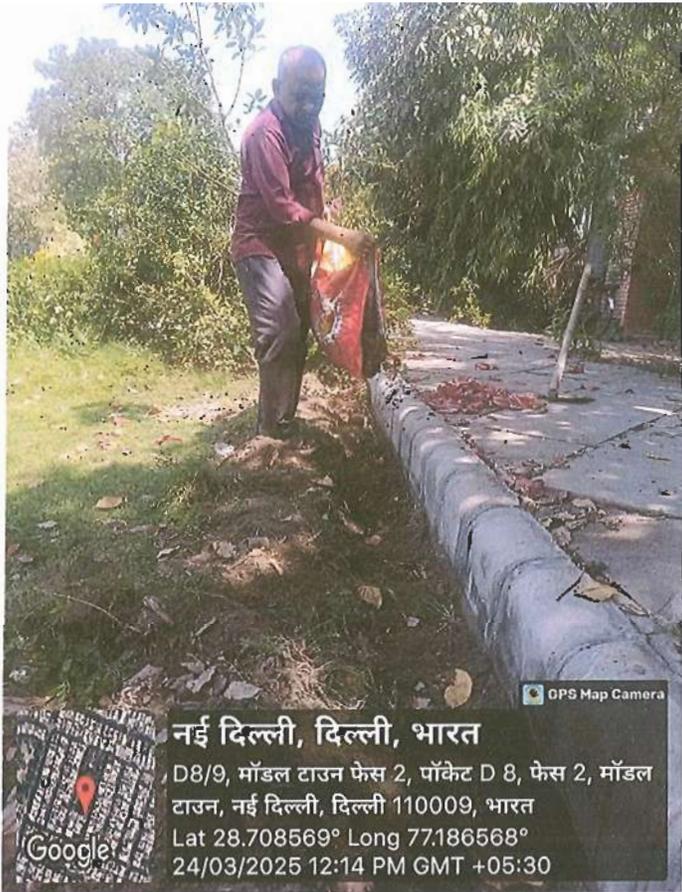
नई दिल्ली, दिल्ली, भारत  
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 टाउन, नई दिल्ली, दिल्ली 110009, भारत  
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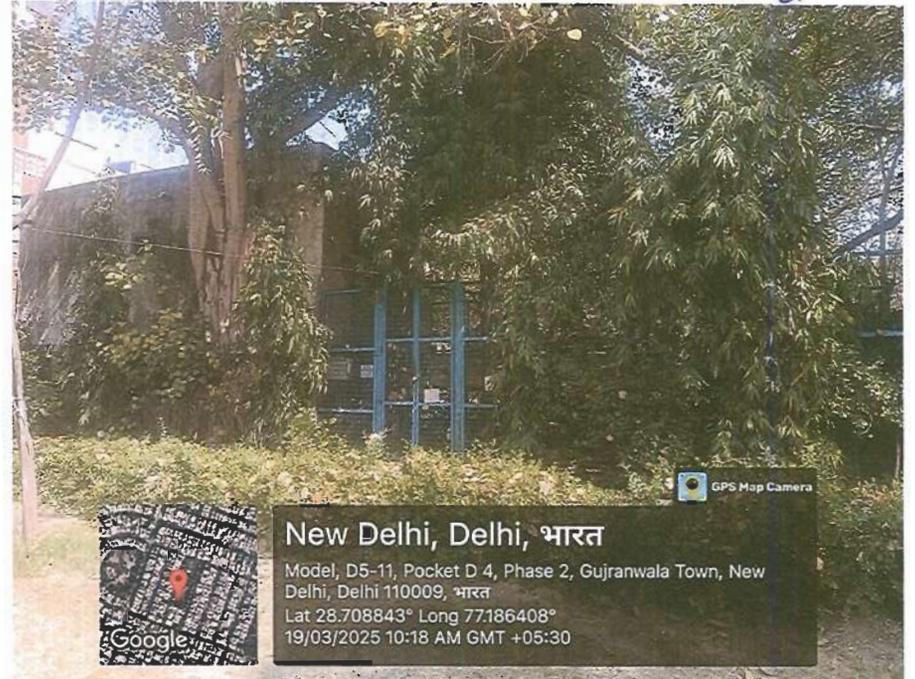




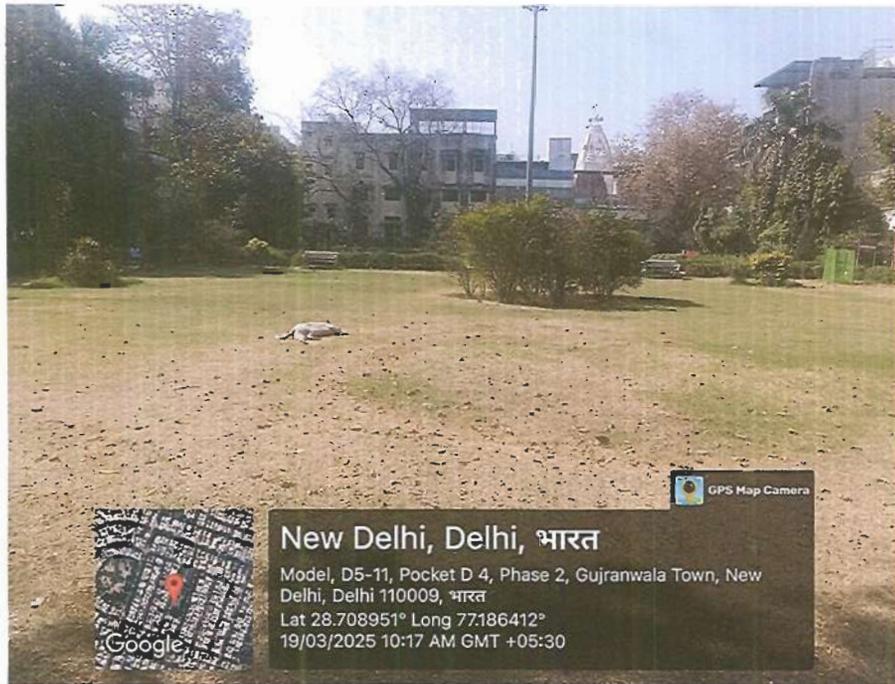




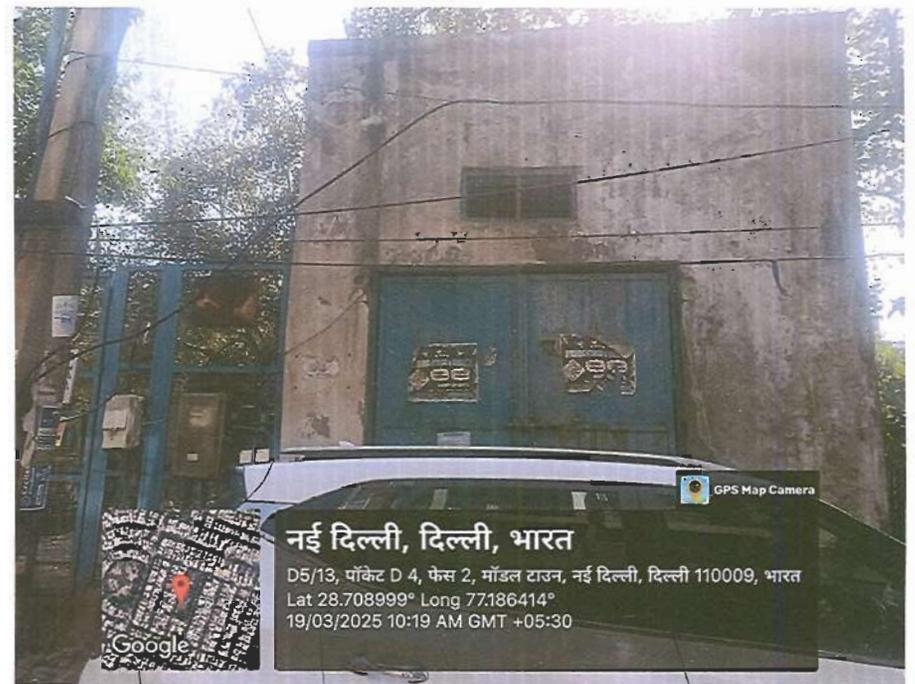

**New Delhi, Delhi, India**  
 D5/8, Pocket D 4, Phase 2, Model Town, New Delhi, Delhi 110009, India  
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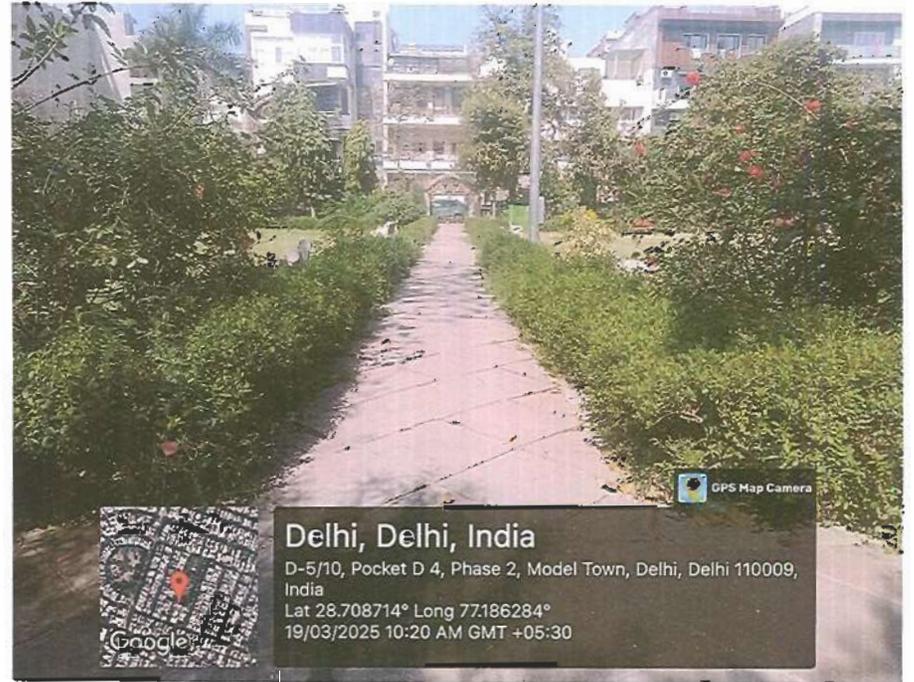
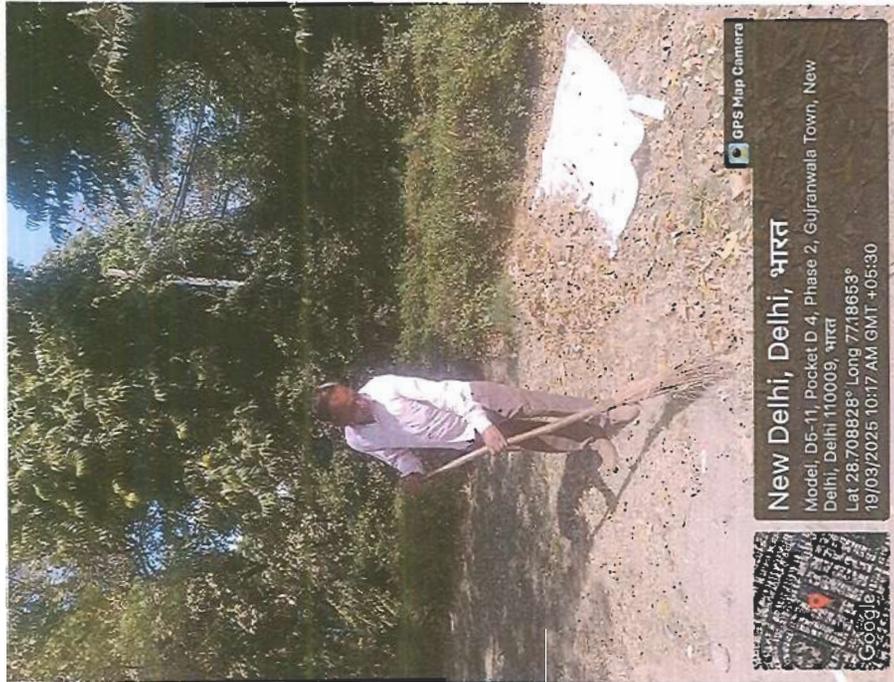
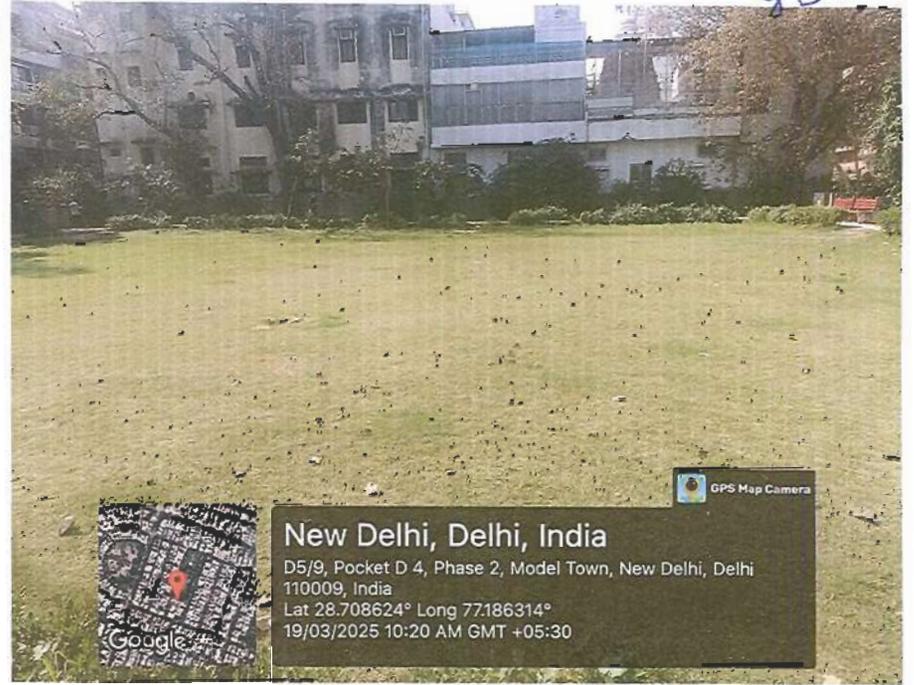
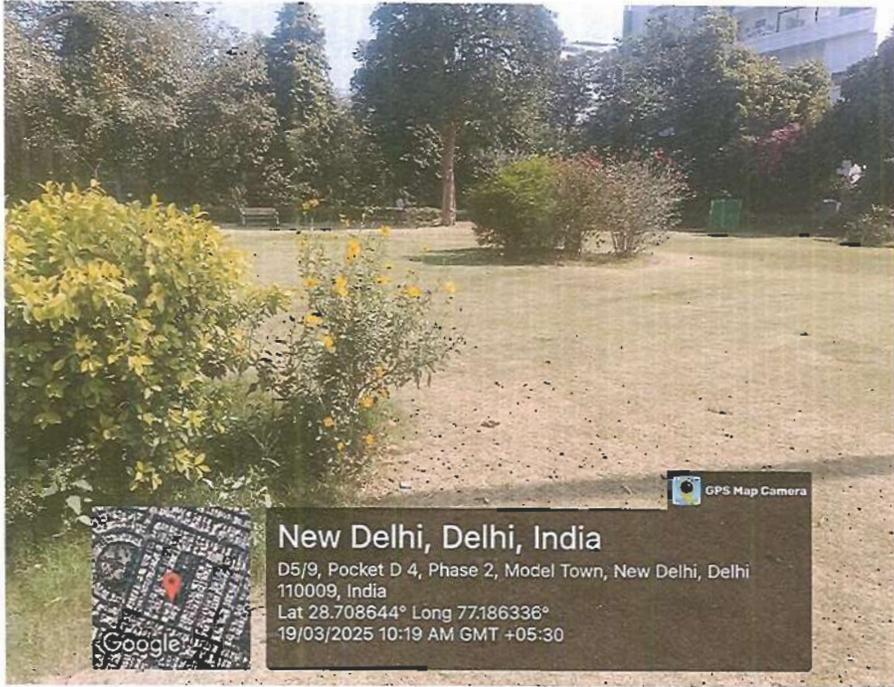

**New Delhi, Delhi, भारत**  
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**New Delhi, Delhi, भारत**  
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**नई दिल्ली, दिल्ली, भारत**  
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GPS Map Camera  
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GPS Map Camera  
 Delhi, Delhi, India  
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GPS Map Camera  
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 110009, भारत  
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GPS Map Camera  
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 Town, New Delhi, Delhi 110009, भारत  
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**New Delhi, Delhi, India**  
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 27/03/2025 04:27 PM GMT +05:30



**New Delhi, Delhi, India**  
 29, Model Town 3rd Main Rd, Model Town Iii,  
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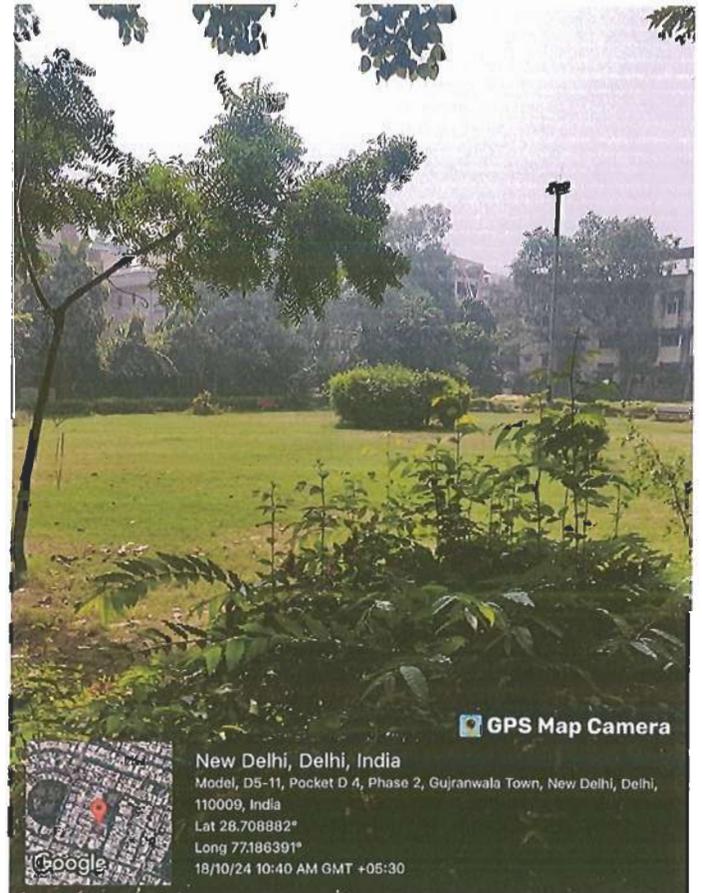
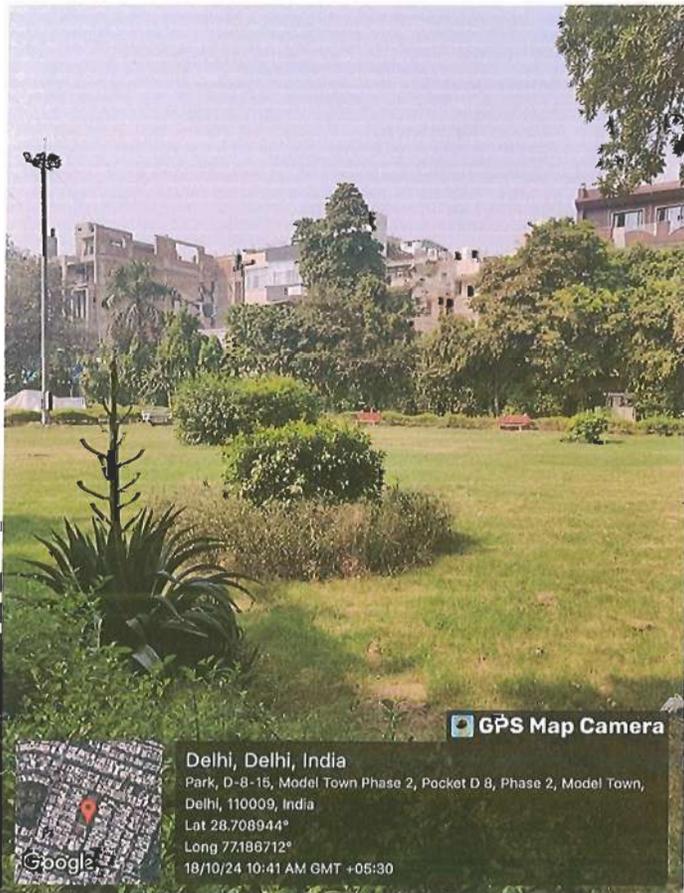
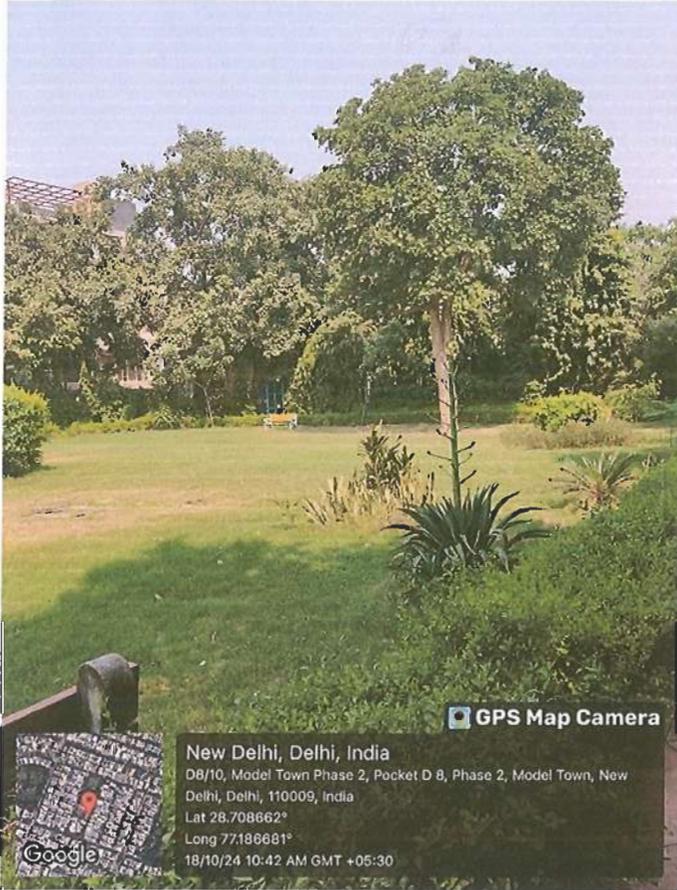


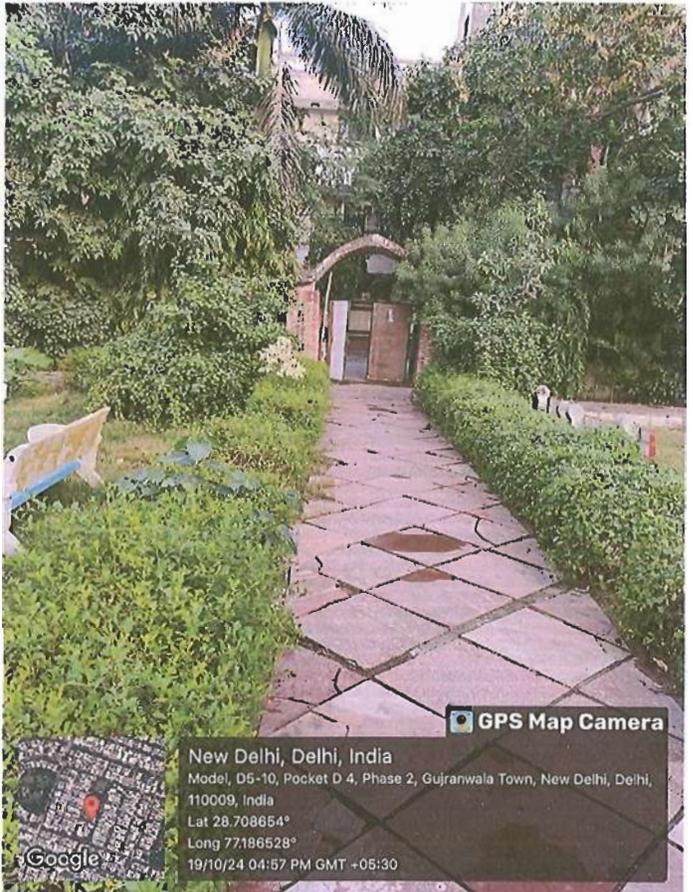
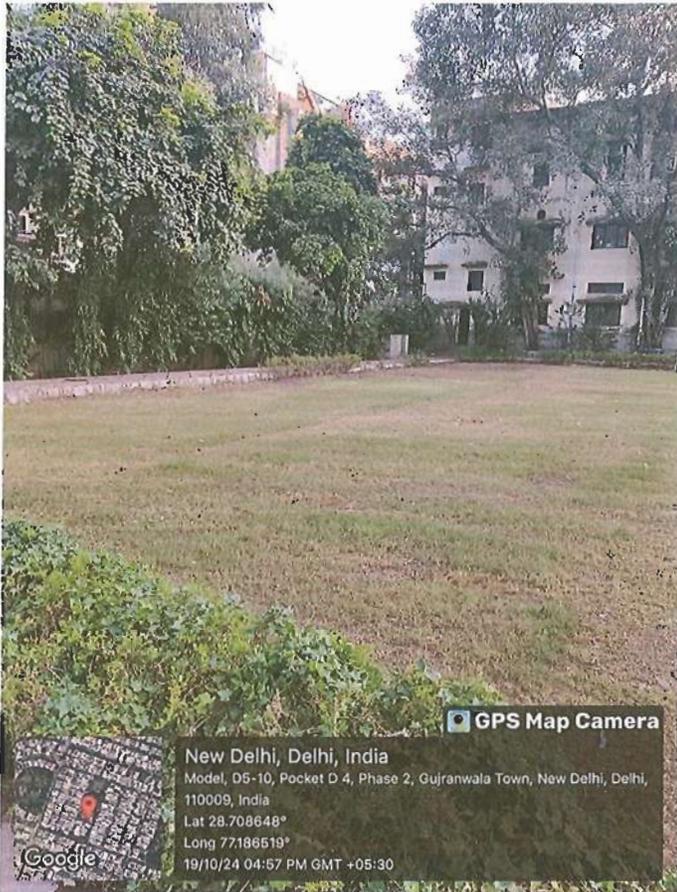
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 110009, भारत  
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**Delhi, Delhi, India**  
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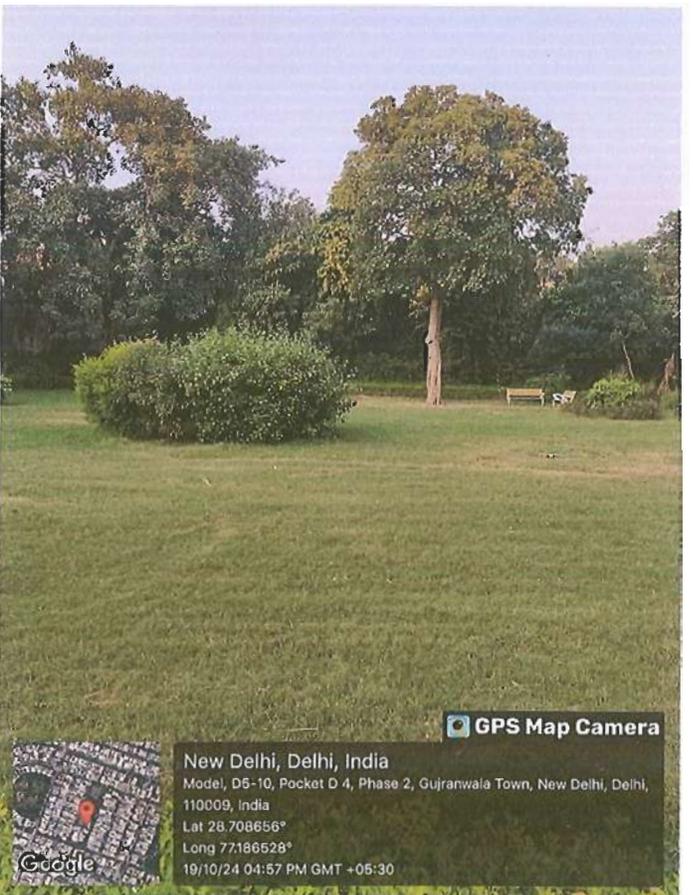
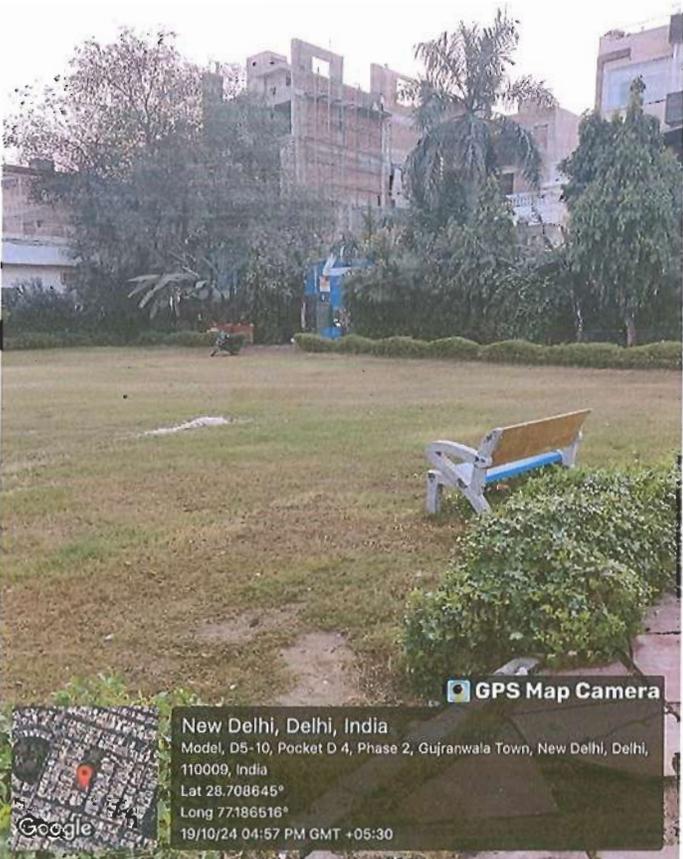






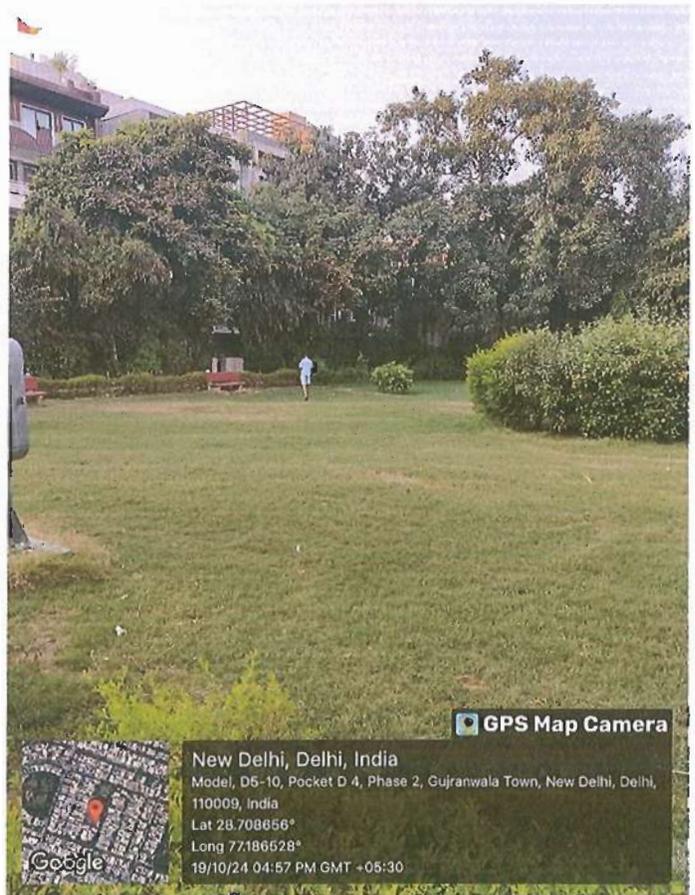
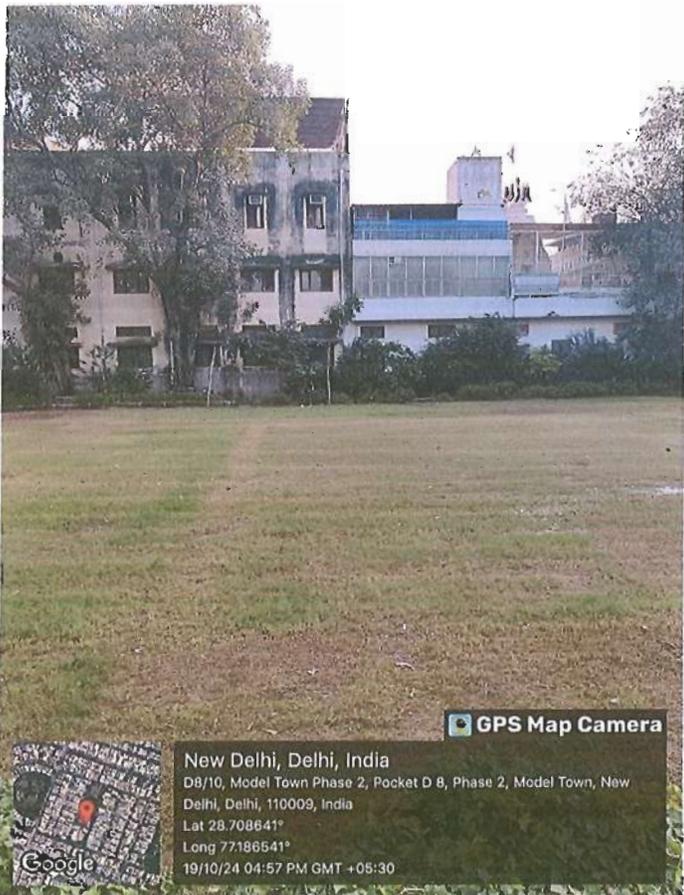
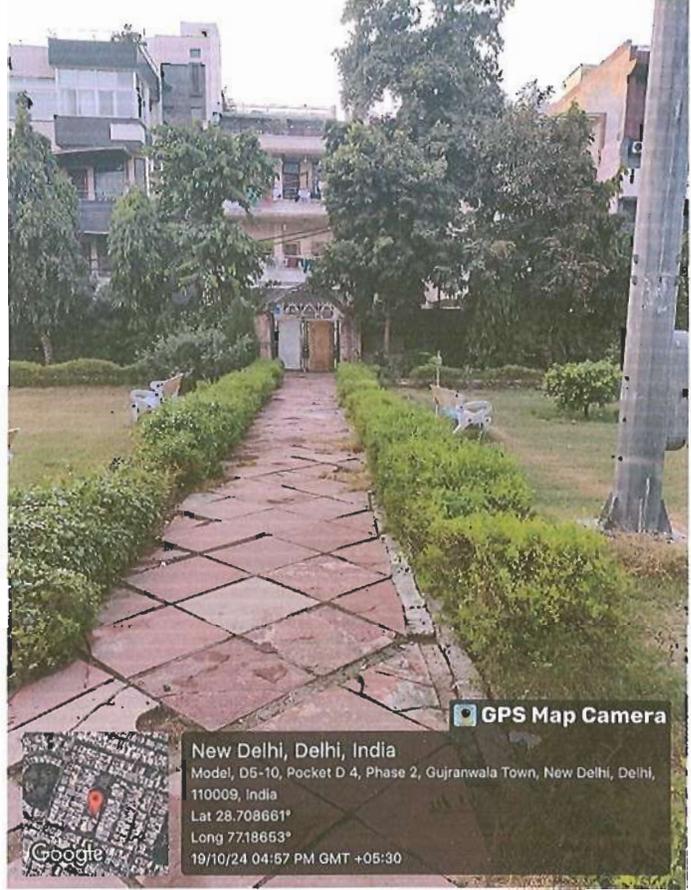
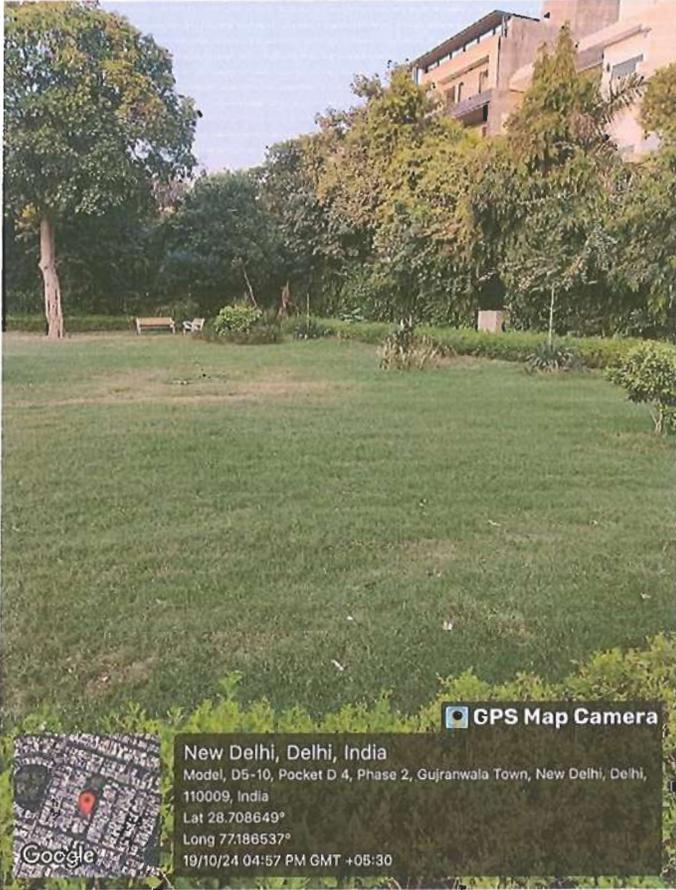
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GPS Map Camera  
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GPS Map Camera  
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Annexure-R-5

90

51 वर्षों से निरंतर भगवान श्री राम की लीला का मंचन

प्रधान : 9310355577  
महामंत्री : 9810048094

# माडल टाउन धार्मिक लीला कमेटी (रजि.)

रामलीला पार्क, डी-ब्लॉक, माडल टाउन-III, दिल्ली-110009

|   |  |   |   |  |
|---|--|---|---|--|
| श्री महावीर प्रसाद टाटिया<br>मुख्य संरक्षक<br>9810048094<br>महामंत्री | श्री बृज मोहन (गोटे वाले)<br>मुख्य परामर्शदाता<br>9811283405<br>मंत्री | श्री हरि राम (कागजो)<br>मुख्य परामर्शदाता<br>9999777952<br>कोषाध्यक्ष | श्री सुरेश केजरीवाल<br>स्वागताध्यक्ष<br>9810294443<br>प्रचार मंत्री | श्री सुरेश कुमार गुप्ता<br>प्रधान<br>9811168200<br>प्रचार मंत्री |
|---|--|---|---|--|

## संरक्षक

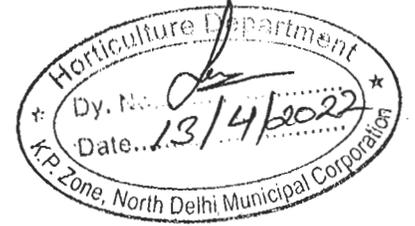
श्री राज पाल गुप्ता  
श्री प्यारे लाल गुप्ता  
श्री वी. डी. अग्रवाल  
श्री सुभाष सिंघल  
श्री सुरेश चन्द जिन्दल  
श्री जय प्रकाश जिन्दल  
श्री पुष्पेन्द्र कुमार गोयल  
श्री प्रदीप जिन्दल  
श्री नरेश कुमार अग्रवाल  
श्री पवन कुमार अग्रवाल  
श्री ईश्वर दयाल सिंघल  
श्री तेजराम सिंगला  
श्री मनोज गोयल  
श्री राजेश केजरीवाल  
श्री संजय गोयल (एफ ब्लॉक)  
श्री सुरेन्द्र अग्रवाल  
श्री अतुल गुप्ता (सुपारी वाले)  
श्री रमेश गोयल  
श्री सुनिल जिन्दल  
श्री जगमोहन गुप्ता  
श्री महेन्द्र सिंघल  
श्री रविन्द्र गोयल  
श्री विरेन्द्र अग्रवाल  
श्री मुकेश गोयल  
श्री दिनेश गुप्ता  
श्री प्रदीप गर्ग  
श्री अजय शर्मा  
श्री प्रवीण गुप्ता  
(P.K. Furnishing)  
श्री राजेश गुप्ता (बीकानेर स्वीट)  
श्री अनिल गुप्ता (मानसरोवर)

Office: F5/11, Model Town, Delhi-110009

क्रमांक .....

दिनांक 13-04-22

To  
The Dy Director Horticulture  
Keshav Puram Zone  
North Delhi Municipal Corporation  
Keshav Puram  
New Delhi



Sub- Your letter Ref:- No DDH/KPZ/2019-20/681 dt 21.03.2022 regarding poor maintenance of Ayodhya Puri Park (Jawahar Park) D Block Model Town, Delhi -110009

Dear Sir,

This is in reply to your letter referred above for complaints regarding poor maintenance of Park taken over by our organization on MOU basic. Please find our replies:-

1. It is wrong and pointless that no Mali was working in the park. We have employed a permanent Mali Named "Sharvan" which is well known knowledge of your area supervisor Mr. Gajendra Chowdery Ji
2. There was no garbage at all in the park only Horticulture work (tree leaves) were lying in one corner which we have made for organic compose to be used in the park.
3. The trees are maintained properly trimmed time to time, which you can see in the photo attached herewith.
4. Sir, this is the time of falling the leaves dry season the leaves are settled in streets as well. Our Mali collects the leaves and put in the corner to make organic compose.
5. Our Mali gives water in the park regularly.

Sir all the allegation against our organization is false and baseless.



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51 वर्षों से निरंतर भगवान श्री राम की लीला का मंचन

91  
प्रधान : 9310355577  
महामंत्री : 9810048094

# माडल टाउन धार्मिक लीला कमेटी (रजि.)

रामलीला पार्क, डी-ब्लाक, माडल टाउन-III, दिल्ली-110009

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|--|---|---|--|--|
| श्री महावीर प्रसाद टांटिया<br>मुख्य संरक्षक<br>श्री राजेन्द्र गुप्ता (रंग वाले)<br>9810048094<br>महामंत्री | श्री बृज मोहन (गोटे वाले)<br>मुख्य परामर्शदाता<br>श्री विनोद कुमार गुप्ता<br>9811283405<br>मंत्री | श्री हरि राम (कागजी)<br>मुख्य परामर्शदाता<br>श्री नीरज गुप्ता<br>9999777952<br>कोषाध्यक्ष | श्री सुरेश केजरीवाल<br>स्वागताध्यक्ष<br>श्री अजय गुप्ता (सुपारी वाले)<br>9810294443<br>प्रचार मंत्री | श्री सुरेश कुमार गुप्ता<br>प्रधान<br>श्री दिनेश कुमार अग्रवाल<br>9811168200<br>प्रचार मंत्री |
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## संरक्षक

श्री राज पाल गुप्ता  
श्री प्यारे लाल गुप्ता  
श्री वी. डी. अग्रवाल  
श्री सुभाष सिंघल  
श्री सुरेश चन्द जिन्दल  
श्री जय प्रकाश जिन्दल  
श्री पुष्पेन्द्र कुमार गोयल  
श्री प्रदीप जिन्दल  
श्री नरेश कुमार अग्रवाल  
श्री पवन कुमार अग्रवाल  
श्री ईश्वर दयाल सिंघल  
श्री तेजराम सिंगला  
श्री मनोज गोयल  
श्री राजेश केजरीवाल  
श्री संजय गोयल (एफ ब्लॉक)  
श्री सुरेन्द्र अग्रवाल  
श्री अतुल गुप्ता (सुपारी वाले)  
श्री रमेश गोयल  
श्री सुनिल जिन्दल  
श्री जगमोहन गुप्ता  
श्री महेन्द्र सिंघल  
श्री रविन्द्र गोयल  
श्री विरेन्द्र अग्रवाल  
श्री मुकेश गोयल  
श्री दिनेश गुप्ता  
श्री प्रदीप गर्ग  
श्री अजय शर्मा  
श्री प्रवीण गुप्ता  
(P.K. Furnishing)  
श्री राजेश गुप्ता (बीकानेर स्वीट)  
श्री अनिल गुप्ता (मानसरोवर)

क्रमांक ..... Office: F5/11, Model Town, Delhi-110009

दिनांक .....

We invite your goodself and director Horticulture to make a visit anytime in the park.

Thanking you

Your's sincerely

For Model Town Dharmik Leela Committee

*Rajendra Gupta*

General Secretary

Rajendra Gupta (Rang Wale)

c.c. 1. Smt. Seema Gupta ji

Dy Zone Chairperson

North Delhi Municipal Corporation

2. The Director (Horticulture)

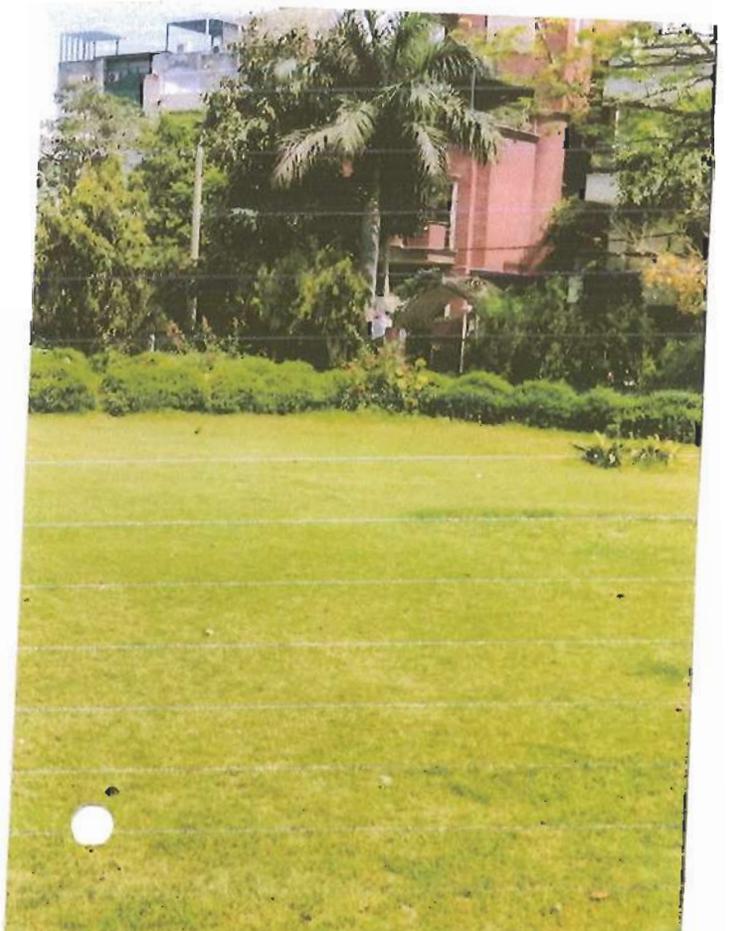
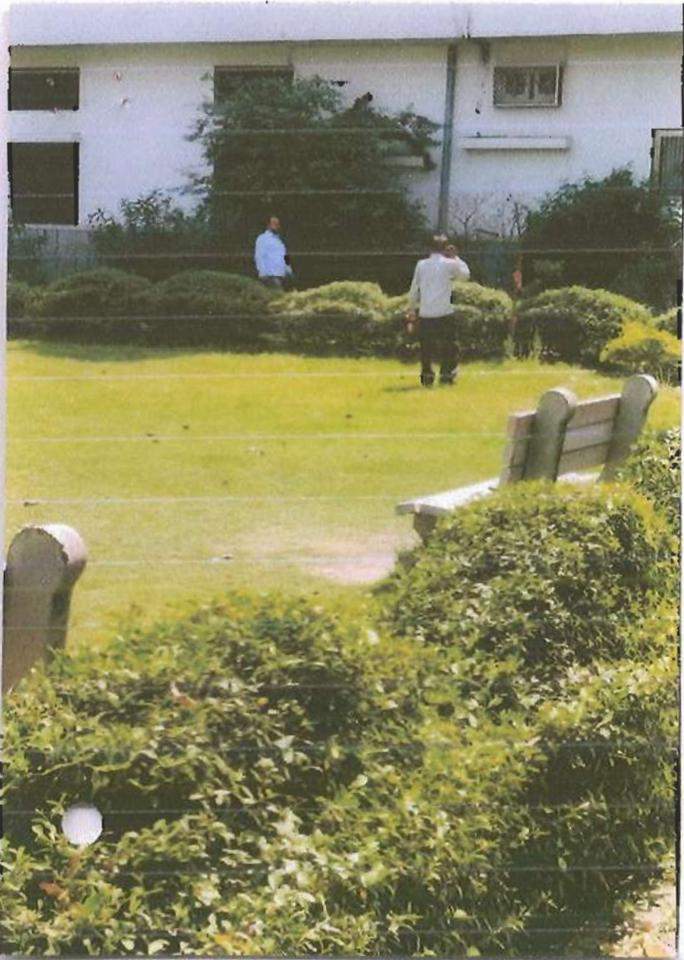
North Delhi Municipal Corporation

Civic Centre New Delhi

Encl: - As Photos

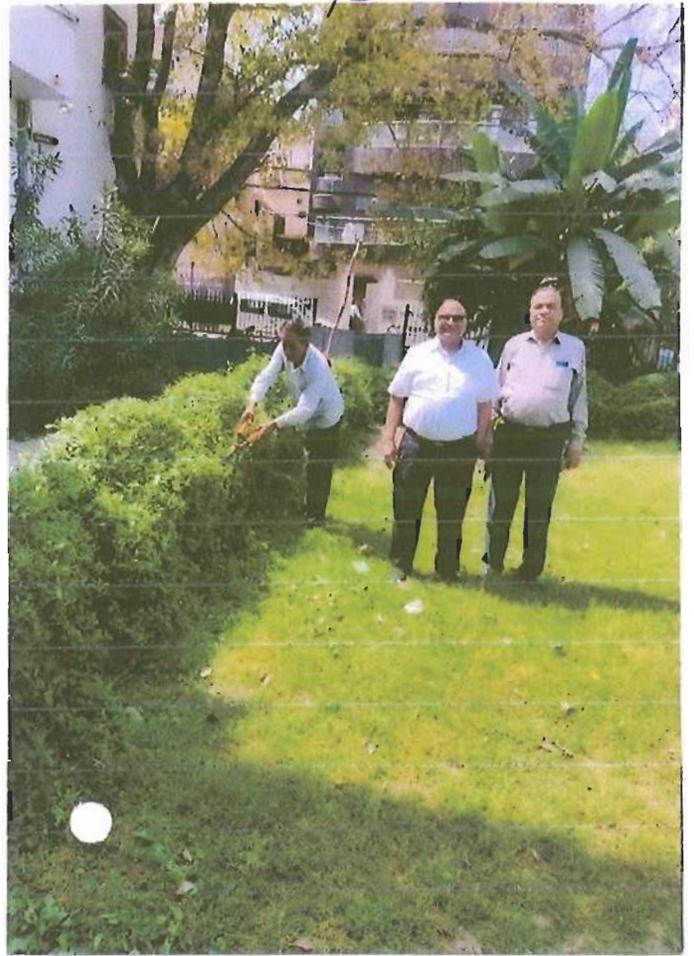
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453  
51 वर्षों से निरंतर भगवान श्री राम की लीला का मंचन

94  
प्रधान : 9310355577  
महामंत्री : 9810048094

# माडल टाउन धार्मिक लीला कमेटी (रजि.)

रामलीला पार्क, डी-ब्लॉक, माडल टाउन-III, दिल्ली-110009

|  |  |   |   |  |
|--|--|---|---|--|
| श्री महावीर प्रसाद टांटिया<br>मुख्य संरक्षक<br>9810048094<br>महामंत्री | श्री बृज मोहन (गोटे वाले)<br>मुख्य परामर्शदाता<br>9811283405<br>मंत्री | श्री हरि राम (कागजी)<br>मुख्य परामर्शदाता<br>9999777952<br>कोषाध्यक्ष | श्री सुरेश केजरीवाल<br>स्वागताध्यक्ष<br>9810294443<br>प्रचार मंत्री | श्री सुरेश कुमार गुप्ता<br>प्रधान<br>9811168200<br>प्रचार मंत्री |
|--|--|---|---|--|

## संरक्षक

श्री राज पाल गुप्ता  
श्री प्यारे लाल गुप्ता  
श्री वी. डी. अग्रवाल  
श्री सुभाष सिंघल  
श्री सुरेश चन्द जिन्दल  
श्री जय प्रकाश जिन्दल  
श्री पुष्पेन्द्र कुमार गोयल  
श्री प्रदीप जिन्दल  
श्री नरेश कुमार अग्रवाल  
श्री पवन कुमार अग्रवाल  
श्री ईश्वर दयाल सिंघल  
श्री तेजराम सिंगला  
श्री मनोज गोयल  
श्री राजेश केजरीवाल  
श्री संजय गोयल (एफ ब्लॉक)  
श्री सुरेन्द्र अग्रवाल  
श्री अतुल गुप्ता (सुपारी वाले)  
श्री रमेश गोयल  
श्री सुनिल जिन्दल  
श्री जगमोहन गुप्ता  
श्री महेन्द्र सिंघल  
श्री रविन्द्र गोयल  
श्री विरेन्द्र अग्रवाल  
श्री मुकेश गोयल  
श्री दिनेश गुप्ता  
श्री प्रदीप गर्ग  
श्री अजय शर्मा  
श्री प्रवीण गुप्ता  
(P.K. Furnishing)  
श्री राजेश गुप्ता (बीकानेर स्वीट)  
श्री अनिल गुप्ता (मानसरोवर)

क्रमांक ..... Office: F5/11, Model Town, Delhi-110009

दिनांक 25/9/22

To,  
Sh. Yogesh Verma Ji  
Chairman Keshav Puram Zone  
North Delhi Municipal Corporation  
New Delhi

Sub- Permission to organize Ramleela from 28-9-2022 to 10-10-2022  
in Ayodhya Puri Park, D-Block, Model Town-iiiird, Delhi-110009

Respected Sir,

This is to bring in your kind consideration that we are organizing Ramleela in above Park since last 53 years continuously.

Inspite of a banning order in Nov 2019. We have been allowed to organize Ramleela in 2020 and 2021 (Letter of permission enclosed)

Last year your good self have helped us in removing obstacles to hold Ramleela which our whole committee and members of public of Model Town welcomes and thanks to you for your efforts.

We have been allowed the Ramleela in 2021 also with your helped and support. But the covid protocols were not over so we have organized one day program of "Shri Sunder kand Path", which was attended by public in large along with you ,our popular municipal councilor Smt. Seema Gupta Ji. (Dep. Chairman Keshav Puram Zone)

Now the covid protocols are over, so we wish to request you to grant the permission for holding Ramleela from 20-09-2022 to 10-10-2022 in Ayodhya Puri Park, (Jawahar Park) D- Block, Model Town-iiiird, Delhi-110009 and remove all objections to hold Ramleela forever.

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

**IN THE MATTER OF:**

D5 & D8 RESIDENTS' WELFARE ASSOCIATION,  
MODEL TOWN, NEW DELHI

... APPLICANT

VS.

HORTICULTURE DEPARTMENT OF MUNICIPAL  
CORPORATION DELHI, KESHAVPURAM ZONE

... RESPONDENT

**VAKALATNAMA**

Know All to whom these Present shall come that I, Dinesh Kumar Aggarwal, S/o Late Shri Om Prakash Aggarwal R/o K-3/8, Ground Floor, Model Town II, Delhi - 110009 am working as General Secretary of the Respondent No. 2, do hereby appoint -

**Vikas Mehta**

A-445, Ground Floor, Defense Colony, New Delhi-110024  
Mobile No.9996450083

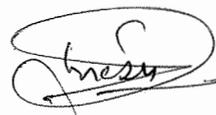
(hereinafter called the advocate/s to be my/our Advocate in the above noted case authorise him/her -

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-objection 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 subjects to payment of fees for each stage.

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 of disputes that may arise touching or in carry manner relating to the said case.

To take execution proceedings on paying separate fee. To deposit, draw and receive money, cheques, cash and grant receipts hereof 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 on 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 fit to do so and to sign the power of attorney on our behalf.

And I/we undersigned to 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 purpose.

And I/we undertake that I/We or my/our duly authorized agent would appear in 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 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 undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be 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 settle 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 WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 04 Day of June 2025. Accepted subject to the terms of the fees.



*V. Anand*

Advocate

D/108/98

*Kartik*  
Kartik Pandey  
NR/2332/2022

*[Signature]*

Client





55 वर्षों से निरंतर भगवान राम की लीला का मंचन

प्रधान : 9810048094  
महामंत्री : 9811168200

# माडल टाउन धार्मिक लीला कमेटी (रजि.)

अयोध्या पुरी पार्क (जवाहर पार्क), डी-ब्लॉक, माडल टाउन-III, दिल्ली-110009

|  |  |  |                                     |  |
|--|--|--|-------------------------------------|--|
| श्री बृज मोहन (गोटे वाले)<br>चेयरमैन       | श्री सुरेश केजरीवाल<br>मुख्य संरक्षक           | श्री सुरेश कुमार गुप्ता<br>मुख्य परामर्शदाता | श्री रमेश गोयल<br>मुख्य परामर्शदाता | श्री जय प्रकाश जिन्दल<br>स्वागताध्यक्ष |
| श्री राजेन्द्र गुप्ता (रंग वाले)<br>प्रधान | श्री दिनेश कुमार अग्रवाल<br>महामंत्री          | श्री विनोद कुमार गुप्ता<br>कोषाध्यक्ष        | श्री मनोज गोयल<br>मंत्री            |  |
|  | श्री अजय गुप्ता (सुपारी वाले)<br>प्रचार मंत्री | श्री निखिल सिंघल<br>प्रचार मंत्री            |                                     |  |

संरक्षक

श्री अखिल सिंघल  
श्री राजेश गुप्ता (बीकानेर स्वीट्स)  
श्री सुभाष सिंघल  
श्री राजेश केजरीवाल  
श्री बिन्नी गोयल  
श्री अमित जैन  
श्री सुरेश चन्द जिन्दल  
श्री सचिन टांटिया-श्री रोहित टांटिया  
श्री गोविन्द गोयल- श्री सुभाष गोयल  
श्री प्रवीण गुप्ता (पी.के. फर्नीचरिंग)  
श्री महेन्द्र सिंघल  
श्री ईश्वर दयाल सिंघल  
श्री संत कुमार सिंघल  
श्री सुरेन्द्र अग्रवाल  
श्री अजय शर्मा  
श्री प्रदीप गर्ग (जीन्स वाले)  
श्री रविन्द्र गोयल (सुगन्ध टी)  
श्री वी.डी. अग्रवाल  
श्री संजय गोयल (एफ)  
श्री राजन गुप्ता  
श्री तेजराम धर्मपाल सिंगला  
श्री नरेश कुमार अग्रवाल  
श्री पवन कुमार अग्रवाल  
श्री किशन गुप्ता-श्री राजू गुप्ता  
श्री संजीव गोयल (बंटी)  
श्री कपिल अग्रवाल (अभारवती वाले)  
श्री सागर मुकेश गोयल  
श्री संजय गोयल (पेठेवाले)  
श्री दिनेश गुप्ता (के)  
श्री विरेन्द्र अग्रवाल  
श्री अनिल गुप्ता (मानसरोवर)  
श्री राजेश गुप्ता-श्री राकेश गुप्ता  
श्री सुरेश गुप्ता (गुरुजी)  
श्री आदेश जैन  
श्री शोभा चन्द शारडा  
श्री दिनेश अग्रवाल (सी)  
श्री संदीप अग्रवाल (के)  
श्री आनन्द शर्मा (टेगौर पार्क)  
श्री प्रदीप शर्मा  
श्री विनोद सिंघल (के)  
श्री प्रदीप जिन्दल  
श्री अशोक गोयल (नीट)  
श्री शिव कुमार बंसल  
श्री पंकज गर्ग  
श्री कपिल अरोड़ा  
श्री विकास तायल (टेगौर पार्क)  
श्री शेखर नरुला  
श्री अजय अग्रवाल (डी)  
श्री जगमोहन गुप्ता  
श्री विनोद अग्रवाल (डी)  
श्री पंकज गुप्ता (रामा कैम्पकल्स)  
श्री दीपक गुप्ता (डी)

क्रमांक .....

दिनांक 24/5/2015

## RESOLUTION

To appoint authorised representative to appear before court in the case titled:-

**D5 & D8 Residents Welfare Association Model Town New Delhi Vs Horticulture Department, Municipal Corporation Of Delhi, Keshavpuram Zone, Delhi**

"**RESOLVED THAT** Mr. Dinesh Kumar Aggarwal, General Secretary of Model Town Dharmik Leela Committee (Regd.) Be and is hereby authorised to appear before the court on the behalf of Model town Dharmik Leela Committee Regd. Ayodhya Puri Park (Jawahar Park), D-Block, Model Town-3, Delhi-110009 in above matter.

**FURTHER RESOLVED THAT** Sh. Dinesh Kumar Aggarwal General Secretary of Model Town Dharmik Leela Committee (Regd.). Be and is hereby further authorised to sign and submit the application, plaints, affidavits, petitions, counter claims and any other papers/ documents as may be required to be filed in court or with any other authorities in connection with the above said case matter by or against Model Town Dharmik Leela Committee (Regd.) and to represent the Model Town Dharmik Leela Committee (Regd.) in all other matters incidental thereto as may be considered necessary and expedient to and to do all such acts and deeds as may be necessary in this regard."

For Model Town Dharmik Leela Committee (Regd.)

Rajender Gupta  
President

Dinesh Kumar Aggarwal  
Gen. Secretary

Vinod Gupta  
Treasurer

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OA No. 1150/2024 (I.A. No. 433/2024, I.A. No. 474/2024 & I.A. No. 577/2024) D5 & D8 Residents Welfare Association, Model Town, New Delhi Applicant Versus Horticulture Department of MCD, Keshavpuram Zone

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From Vikas Mehta <mehtavikas@hotmail.com>

Date Sat 7/5/2025 7:37 PM

To abhishekshivpuri@outlook.com <abhishekshivpuri@outlook.com>

Cc divya@dylawchambers.com <divya@dylawchambers.com>

Dear Sir,

Please find attached the reply to the OA No. 1150/2024 to be filed before the Hon'ble National Green Tribunal.

Please consider the same as advance service. Please acknowledge the same.  [Reply NGT.pdf](#)

Best Regards,

Chambers of Vikas Mehta

Advocate

59, Lawyers Chambers,

Supreme Court of India,

New Delhi - 110001 [Ph: 23389900]

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