

**BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI**  
**I.A. No. 633 OF 2025**  
**IN**  
**APPEAL NO. 62 OF 2025**

**IN THE MATTER OF:**

Rajpal Saini and Another

...Appellants

Versus

Union of India and Others

...Respondents

**INDEX**

S. NO.	PARTICULARS	PAGE NO.
1.	Reply on behalf of respondent no. 3 to the application seeking condonation of delay along with affidavit	1-15
2.	Vakalatnama	16
3.	Proof of Service	17

FILED BY



UNUC Legal LLP  
 Advocate for the Petitioner  
 P-97, South Extension – II,  
 New Delhi – 110049  
 Mob.: 9810881396

Email: unuconsultants@gmail.com

PLACE: NEW DELHI

DATE: 11.11.2025

\

**BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI**  
**I.A. No. 633 OF 2025**  
**IN**  
**APPEAL NO. 62 OF 2025**

**IN THE MATTER OF:**

Rajpal Saini and Another

...Appellants

Versus

Union of India and Others

...Respondents

**REPLY ON BEHALF OF RESPONDENT NO. 3 TO THE APPLICATION**  
**SEEKING CONDONATION OF DELAY**

**MOST RESPECTFULLY SHOWETH:**

1. That the present reply is being filed on behalf of Respondent No. 3, M/s Jindal Urban Waste Management (Bawana) Limited (“the answering Respondent”), in response to the Applicants’ Application for Condonation of Delay filed along with the Appeal under Section 16(h) of the National Green Tribunal Act, 2010, challenging the Environmental Clearance (“EC”) dated 18.06.2025 granted by the Ministry of Environment, Forest and Climate Change (“MoEF&CC”) for the 30 MW Waste-to-Energy Thermal Power Project at DSIIDC Industrial Area, Sector-5, Village Bawana, Sub-District Narela, District North Delhi.
2. At the very outset, the Answering Respondent No. 3 denies and refutes the contents of the Appeal and the accompanying Application seeking

2

condonation of delay, save and except to the extent expressly admitted herein. No part thereof shall be deemed to have been admitted merely on account of express or implied non-denial.

## 2. Preliminary Submissions

- A. The present Appeal is hopelessly barred by limitation and liable to be dismissed in limine.
- B. Under Section 16 of the National Green Tribunal Act, 2010, an appeal against the grant of Environmental Clearance (“EC”) must be filed within 30 days from the date of communication of the order, extendable by a further 60 days only upon showing “sufficient cause”. The provision is reproduced herein below:

*“Any person aggrieved by,--  
(h) an order made, on or after the commencement of the National Green Tribunal Act, 2010, granting environmental clearance in the area in which any industries, operations or processes or class of industries, operations and processes shall not be carried out or shall be carried out subject to certain safeguards under the Environment (Protection) Act, 1986 (29 of 1986);  
may, within a period of thirty days from the date on which the order or decision or direction or determination is communicated to him, prefer an appeal to the Tribunal:  
Provided that the Tribunal may, if it is satisfied that the appellant was prevented by sufficient cause from filing the appeal within the said period, allow it to be filed under this section within a further period not exceeding sixty days.”*

- C. Under Section 16 of the National Green Tribunal Act, 2010, an appeal against the grant of Environmental Clearance (“EC”) must be filed within 30 days from the date of communication of the order, extendable by a maximum of 60 additional days only upon showing “sufficient cause”. The statutory

provision clearly stipulates that the Tribunal cannot entertain an appeal filed beyond this outer limit of 90 days.

- D.** In the present case, the Environmental Clearance (EC) was granted and uploaded on the official MoEF&CC “Parivesh” portal on 18.06.2025 (File No. J-13012/04/2023-IA.I(T)). Accordingly, the statutory period of 30 days expired on 17.07.2025.
- E.** However, Appeal No. 62 of 2025 challenging the EC was filed only on 10.09.2025, i.e., a delay of 55 days beyond the statutory period of 30 days (total 85 days after publication).
- F.** The burden lies squarely on the appellants to demonstrate “sufficient cause” for this substantial delay of 55 days, and they have failed to furnish any cogent, convincing, or day-to-day explanation.
- G.** Even assuming, without admitting, that the appellants acquired knowledge of the EC on 04.07.2025, the appeal ought to have been filed within 30 days thereof, i.e., by 03.08.2025. Instead, it was filed on 10.09.2025, resulting in an unexplained delay of 38 days even on their own version.
- H.** The applicants, who claim to be vigilant and environmentally conscious citizens, were actively following the clearance process, as evident from their own representations and communications dated 15.12.2024, 27.12.2024, 03.01.2025, 27.01.2025, and 28.04.2025. This clearly demonstrates their awareness of the ongoing proceedings. Hence, the plea of “lack of knowledge” is clearly an afterthought designed merely to overcome the bar of limitation.
- I.** The explanation offered is vague, perfunctory, and legally insufficient to attract the benefit of Section 5 of the Limitation Act, 1963 (as applicable). The delay therefore deserves no condonation, and the appeal is liable to be dismissed as being barred by limitation.

4

- J.** In light of the above, whether limitation is computed from the date of issuance (18.06.2025) or even from the alleged date of knowledge (04.07.2025), the present appeal is clearly barred by limitation. Consequently, the accompanying application for condonation of delay deserves to be dismissed, and the appeal rejected as being non-maintainable and barred by law.

### **3. Delay Not Properly Explained**

- A.** It is respectfully submitted that the Hon'ble Supreme Court has consistently held that condonation of delay is an exception and not a rule. The applicant must strictly demonstrate sufficient cause for each day's delay and mere general statements or broad assertions does not fulfil the statutory requirements.
- B.** The Hon'ble Supreme Court in *Esha Bhattacharjee v. Managing Committee of Raghunathpur Nafar Academy & Ors.*, (2013) 12 SCC 649, held that although a liberal approach is permissible, such liberality cannot override the mandatory requirement of proving sufficient cause. The Court observed that the phrases "*liberal approach*" and "*substantial justice*" cannot be used to defeat the law of limitation, and that courts cannot revive stale or dead causes under the guise of Section 5 of the Limitation Act. The court further clarified that once the limitation period has expired, a substantive right accrues in favour of the successful party, and such right cannot be lightly disturbed. Even when sufficient cause is shown, condonation remains a matter of judicial discretion and not an automatic entitlement.
- C.** The Hon'ble Supreme Court in the judgement of *Balwant Singh (Dead) v. Jagdish Singh & Ors.*, (2010) 8 SCC 685, categorically held that a party seeking condonation of delay must explain the delay day by day and show

that the delay was both bona fide and unavoidable. A casual or mechanical explanation does not meet the test of sufficient cause.

- D. Similarly, in *Office of the Chief Post Master General v. Living Media India Ltd.*, (2012) 3 SCC 563, the Apex Court observed that condonation of delay cannot be claimed as an anticipated benefit and must be supported by plausible and acceptable reasons. The Court warned that condonation should not be granted in a routine or mechanical manner.
- E. Further, in *Basawaraj & Anr. v. Special Land Acquisition Officer*, (2013) 14 SCC 81, the Supreme Court reiterated that though the law of limitation may sometimes appear harsh, it must be applied with full rigour when the statute so provides. The Court categorically held that it has no power to extend limitation on equitable grounds.
- F. The Hon'ble Supreme Court in the judgement of *Pathpati Subba Reddy (died) by L.Rs & Ors. versus the Special Deputy Collector SLP (C) No. 31248 of 2018* has summarised the governing principles regarding the limitation act as follows:-

*“(i) Law of limitation is based upon public policy that there should be an end to litigation by forfeiting the right to remedy rather than the right itself; (ii) A right or the remedy that has not been exercised or availed of for a long time must come to an end or cease to exist after a fixed period of time; (iii) The provisions of the Limitation Act have to be construed differently, such as Section 3 has to be construed in a strict sense whereas Section 5 has to be construed liberally; (iv) In order to advance substantial justice, though liberal approach, justice-oriented approach or cause of substantial justice may be kept in mind but the same cannot be used to defeat the substantial law of limitation contained in Section 3 of the Limitation Act; (v) Courts are empowered to exercise discretion to condone the delay if sufficient cause had been explained, but that exercise of power is discretionary in nature and may not be exercised even if sufficient*

6

*cause is established for various factors such as, where there is inordinate delay, negligence and want of due diligence; (vi) Merely some persons obtained relief in similar matter, it does not mean that others are also entitled to the same benefit if the court is not satisfied with the cause shown for the delay in filing the appeal; (vii) Merits of the case are not required to be considered in condoning the delay; and (viii) Delay condonation application has to be decided on the parameters laid down for condoning the delay and condoning the delay for the reason that the conditions have been imposed, tantamounts to disregarding the statutory provision.*

- G. Therefore, applying these principles to the present case, it is submitted that the applicant has failed to demonstrate any bona fide reason or day-to-day explanation for the delay.
- H. The explanation given by the applicant is general in nature and remains unsupported by any documentary material. It fails to disclose any unavoidable impediment or genuine cause preventing the timely filing of the appeal and hence fails to meet the standard of 'sufficient cause' which must be shown for every day's delay. Hence, the application deserves to be dismissed as being devoid of merit.

#### **4. Negligence and Inaction on the Part of the Applicant;**

- A. The delay is wholly attributable to the Applicant's negligence and lack of due diligence. The grounds cited such as lack of knowledge, administrative difficulties, or correspondence with authorities do not constitute sufficient cause in law.
- B. The Applicant claims to have come to know about the EC only on 04.07.2025. Even if such contention is accepted (which is denied), the Applicant was required to file the appeal within 30 days thereof, i.e., by 03.08.2025. The appeal has not been filed within that period.

- C. Further, It is an admitted fact that the Applicants had been actively participating in the public hearing conducted by DPCC on 27.12.2024 and were aware of the environmental appraisal process, including the MoEF&CC's consideration of the project. They had been submitting representations and engaging in protests since 2023. Hence, they cannot claim to be unaware that the EC was likely to be granted following completion of the appraisal.
- D. The EIA Notification, 2006 mandates disclosure of all clearances on the websites of both the MoEF&CC and the concerned State Pollution Control Board. The answering Respondent complied fully with this requirement, and the EC was duly placed on the public record. Therefore, the Applicants' plea of lack of communication is factually incorrect.
- E. The Applicants rely on newspaper reports, representations to political functionaries, and correspondence with administrative authorities as justification for the delay. However, such correspondence cannot suspend or extend the statutory limitation. Reliance is placed on the judgment of the Hon'ble Supreme Court in *Union of India v. M.K. Sarkar*, (2010) 2 SCC 59, wherein it was held that consideration of a belated representation does not revive a stale or time-barred claim, and that the date of such consideration cannot furnish a fresh cause of action. The Hon'ble Court cautioned that courts and tribunals should not entertain matters which have become dead due to inordinate delay, as limitation cannot be circumvented under the guise of subsequent correspondence or representations. Applying the same principle to the present matter, the applicants, having remained silent well beyond the statutory period prescribed under Section 16 of the NGT Act, cannot seek to reopen limitation on the plea of subsequent communications

or alleged late knowledge. The application is therefore hopelessly barred by limitation and liable to be dismissed in limine.

**5. No Exceptional Circumstances Shown.**

- A. The Applicant has failed to show any exceptional or unavoidable circumstances that prevented filing within the prescribed time.
- B. The Applicants have failed to demonstrate any exceptional or unavoidable circumstance that prevented timely filing. The reasons cited such as seeking advice, consulting advocates, or studying documents are routine preparatory steps which cannot justify condonation.
- C. The alleged delay of 38 days beyond the 30-day period is, in effect, a delay of more than two months from the date of actual knowledge, which does not satisfy the threshold for “sufficient cause” under the NGT Act. The Applicants’ conduct reflects indecision rather than bona fide inability.
- D. It is a settled principle that “law aids the vigilant and not those who sleep over their rights”. Therefore, in the absence of any convincing justification, the delay cannot be condoned merely on sympathetic or equitable grounds.

**6. Prejudice to the Respondent.**

- A. Condoning such an inordinate and unexplained delay would cause serious prejudice to the Answering Respondent, who has acted bona fide upon the Environmental Clearance and has proceeded with further compliances and project-related activities.
- B. The principle of finality of proceedings demands that settled administrative approvals should not be reopened after the lapse of statutory timelines, especially without any valid justification.

- C. The answering Respondent has acted in reliance on the Environmental Clearance dated 18.06.2025, having mobilised resources, finalised financial arrangements, and initiated preparatory activities for the project. The grant of clearance by a competent authority creates legitimate expectation and statutory finality. Entertaining stale challenges after the limitation period would cause grave prejudice to the Respondent and disrupt long-term infrastructure and public-utility projects undertaken in public interest.
- D. The legislative intent behind Section 16 of the NGT Act is to ensure expeditious environmental adjudication and certainty in regulatory decisions. The Applicants' attempt to invoke equitable considerations cannot override the express limitation provided by statute.

## **7. Legal Position**

- A. Section 16 of the National Green Tribunal Act, 2010 prescribes a strict limitation framework for filing appeals. An appeal must be filed within 30 days from the date of communication of the impugned order. Delay may be condoned only if the appellant demonstrates "sufficient cause", and even such condonation cannot dilute the strict legislative mandate of timely filing.
- B. In the present case, the Environmental Clearance ("EC") was granted and uploaded on 18.06.2025 on the MoEF&CC "Parivesh" portal (File No. J-13012/04/2023-IA.I(T)). Uploading on the official portal constitutes valid communication under the EIA Notification, 2006. Accordingly, the limitation period commenced on 18.06.2025, and the statutory 30-day period expired on 17.07.2025.
- C. However, the Appeal was filed only on 10.09.2025, i.e., 85 days after the EC was communicated and 55 days beyond the statutory 30-day period. Such a substantial delay requires strict and convincing justification, which is

completely absent. The Hon'ble NGT in *Nikunj Developers and Others v. State of Maharashtra*, M.A. No. 247/2012, has held that the limitation regime under Section 16 must be strictly construed and cannot be relaxed on equitable considerations.

- D. Even assuming, without admitting, the Appellants' alleged "date of knowledge" of 04.07.2025, the Appeal ought to have been filed within 30 days, i.e., by 03.08.2025. Instead, the Appeal was filed on 10.09.2025, resulting in an unexplained delay of 38 days even on their own version. After expiry of the statutory 30-day period, the burden lies squarely on the Appellant to show a bona fide impediment, which they have wholly failed to do.
- E. It is settled law that delay cannot be condoned mechanically or as a matter of right. The Hon'ble Supreme Court in *State of Bihar v. Kameshwar Prasad Singh* (2000) 9 SCC 94 and *Sridevi Datla v. Union of India*, Civil Appeal No. 3136/2020, has held that statutory limitation must be applied strictly, especially where the governing statute prescribes a special limitation regime. Negligence, inaction, or lack of diligence cannot be grounds for condonation.
- F. The Appellants have failed to provide any day-to-day explanation or credible justification for the delay.

#### **PARAWISE REPLY**

1. That the contents and averments of paragraph 1 are a matter of fact and does not warrant any reply from the Respondent.
2. That the contents and averments of paragraph 2 are a matter of fact and does not warrant any reply from the Respondent.
3. That the contents and averments of paragraph 3 are denied for the want of knowledge. It is submitted that the Environmental Clearance was uploaded

on the MoEF&CC “Parivesh” portal on 18.06.2025, which constitutes valid communication. The Petitioner is deemed to have constructive knowledge of the EC from the date of such uploading and cannot now plead ignorance of a document that was made publicly accessible on the Ministry’s official digital platform. That the contents and averments made in paragraph 4 are baseless, misleading and hence denied. It is submitted that the Applicants were fully aware of the appraisal process at every stage, including the hearings and related proceedings. They not only participated in the public hearing but also submitted multiple representations. Their own communications dated 15.12.2024, 27.12.2024, 03.01.2025, 27.01.2025 and 28.04.2025 clearly establish that they were actively monitoring and engaging with the clearance process. Hence, the plea of “lack of knowledge” is clearly an afterthought designed merely to overcome the bar of limitation.

4. That the contents and averments made in Paragraph 5,6,7 and 8 are misleading, baseless and hence denied. It is submitted that the Environmental Clearance was uploaded on the MoEF&CC “Parivesh” portal on 18.06.2025, which constitutes valid communication. Secondly, the Applicants’ contention that the Environmental Clearance reached the DPCC IT Cell only on 02.07.2025 and was “in all probability” uploaded on 03.07.2025 is speculative and contrary to the official record. The file noting dated 30.06.2025 clearly directs that the Environmental Clearance be placed on the DPCC website and notice board for thirty days. There is nothing on record to show that the IT Cell delayed compliance until 03.07.2025. It is submitted that the Applicants cannot pick a date most convenient to them. Even then the Appeal has been filed only on the 85th day (30+55 days thereafter). Mere conjecture about the

12

“probable” date of upload cannot extend limitation or cure the Applicants’ lack of diligence.

5. That the contents and averments made in paragraphs 9-14 are baseless, misleading and hence vehemently denied. It is submitted that “Communication” of an Environmental Clearance occurs when it is made publicly available by the competent authority here, MoEF&CC which was done on the Parivesh portal on 18.06.2025, thereby triggering limitation from that date. The Applicants cannot postpone limitation based on their own chosen date of access. Their plea of lack of internet access is baseless since they were actively participating in public processes, submitting representations, engaging with authorities, and monitoring the project, demonstrating awareness about the project. It is settled law, that post-facto communications or internal departmental exchanges do not reset statutory clocks. Likewise, the Applicants’ reliance on their own representations to various authorities, or on media reports suggesting municipal reconsideration, is misplaced. Their claim of waiting for “further information” is no ground in law. The Applicants’ conduct marked by prolonged inaction despite full opportunity to act reveals negligence rather than diligence, and none of the circumstances pleaded furnish any sufficient cause for condoning the statutory delay. In any event, even if all the Applicants’ assertions are taken at their highest (though not admitted), they have utterly failed to explain the delay on a day-to-day basis, resulting in an unexplained lapse of 85 days (30 + 55), which is fatal to their case.
6. That the contents and averments made in paragraph 15-19 are baseless, misleading and hence vehemently denied. It is submitted that the Applicants’ alleged difficulty in “understanding documents” or comprehending technical material is no justification for delay. The Environmental Clearance, EIA, and

appraisal documents were publicly available since 18.06.2025 and such routine preparatory steps do not constitute “sufficient cause” under law. Likewise, the Applicants’ purported inability to identify lawyers, consult experts, or analyse the project in time are standard steps every litigant is expected to undertake within the prescribed limitation period; they cannot be invoked to override a statutory bar. The plea of “technical complexity” or “bona fide reasons” is equally devoid of merit. The Applicants have been aware of the project since at least 2023, have actively participated in hearings, and have made multiple representations, which shows knowledge and engagement yet they chose not to act within time. Their conduct reflects negligence and deliberate inaction rather than diligence, and they have provided no day-to-day explanation for the delay. Even assuming their narrative is taken at its highest (though not admitted), the Applicants still fail to explain the substantial delay, which remains wholly unjustified.

7. That the contents and averments made in paragraph 20 and 21 are false, misconceived and hence denied. The Applicants have failed to demonstrate any exceptional circumstance preventing timely filing. The Respondent has already commenced works, planning activities, mobilisations, and statutory compliances pursuant to the granted Environmental Clearance. Any belated disturbance of the EC at this stage would cause grave prejudice and substantial loss to the Respondent, who has acted bona fide and in reliance on the finality of the clearance.
8. That the contents of prayer are denied in toto. The EC was granted after a detailed appraisal by the Expert Appraisal Committee, considering all objections and materials placed before it.
9. The Applicant’s assertions are baseless, unsubstantiated and unsupported by

14

any expert report, technical data, or credible material. It is respectfully submitted that mere allegations cannot displace the findings of the Expert Appraisal Committee or invalidate a duly granted Environmental Clearance that follows the statutory procedure.

### PRAYER

In view of the foregoing submissions, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- a) Dismiss the Application seeking condonation of delay in filing the Appeal as being devoid of merit and barred by limitation;
- b) Pass such other and further orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.



RESPONDENT

THROUGH

UNUC Legal LLP  
Advocate for the Respondent No. 3  
P-97, South Extension – II,  
New Delhi – 110049  
Mob.: 9810881396  
Email: unuconsultants@gmail.com

PLACE: NEW DELHI

DATE: 14.11.2025

**BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI**  
**IA-633 of 2025 IN-APPEAL NO. 62 OF 2025**

**IN THE MATTER OF:**

Rajpal Saini and Another

...Appellants

Versus

Union of India and Others

...Respondents

**AFFIDAVIT**

I, Ramesh Chandra, S/o Late Shiv Dutt Naudiyal, aged about 56 years, Authorised Representative of Respondent No. 3 Company having its corporate office at Jindal ITF Centre, 28 Shivaji Mark, Moti Nagar, New Delhi – 110015 do hereby solemnly affirm and declare as under:

1. That I am the Authorised Representative of the Respondent No. 3 company and the I am filing the present reply and in such capacity, I am well conversant with the facts and circumstances of the case and competent to swear this affidavit.
2. That the accompanying reply which has been filed under my instructions, I have read and fully understood. The averments therein are true and correct to my knowledge and records available with the Company.
3. That the annexures filed along with the reply are true copies of their respective originals.

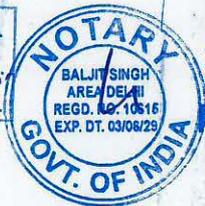


*[Signature]*  
**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this **14**th day of November, 2025, that the contents of this affidavit are true and correct to my knowledge. No part of it is false nor has anything material been concealed therefrom.

BOOK NO. 1  
 PAGE NO. 05  
 SERIAL NO. 1604/2025



**ATTESTED**  
*[Signature]*  
**BALJIT SINGH**  
 NOTARY DELHI-R-10615  
 Govt. of India  
 NEW DELHI



*[Signature]*  
**DEPONENT**

Solemnly Affirmed Sworn Before me  
*[Signature]*  
 Notary Public New Delhi India

**14 NOV 2025**

My Commission will expiry on 03-06-2029

**BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI  
APPEAL NO. 62 OF 2025**

**IN THE MATTER OF:**

**Rajpal Saini and Another**

**...Appellants**

**Versus**

**Union of India and Others**

**...Respondents**

KNOW ALL to whom this present shall come that I, Ramesh Chandra Authorized representative of Appellant in the above named, do hereby appoint:

Varun Sharma	Anmol Wadhwa	Piyush Gupta	Aditi Anup
D-3509/2017	D-4882/2022	D-8514/2025	D-10786/2025

**PANAN UPADHYAY  
D-1293/1995**

UNUC LEGAL LLP  
ADVOCATE FOR RESPONDENT No. 3  
P-97, South Extension Part-II,  
New Delhi-110049,  
Email: [unuconsultants@gmail.com](mailto:unuconsultants@gmail.com)  
Mob: 011-41057587

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

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign, file verify and present pleadings, appeals cross-objections or petitions for execution 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.

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

To take execution proceedings. The 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 of 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 they may think fit to do so and to sign the Power of Attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/ us to all intents and purposes.

And I/ We undertake that I/We or my/our duly authorized agent would appear in the 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 himself.

And I/We the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/ us to 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 settled is only for the above case and above Court. I/We hereby agree that once the fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been undersigned by me/ us on this 13 day of November, 2025.

Accepted subject to the terms of fees  
Advocate

I identify the signature of

Client.



*41*  
*Pawan Upadhyay*  
*Anmol*  
*D/4882/2022*

*Piyush Gupta*  
*Aditi*  
*D/10786/2025*

## Advance Service of Reply to Condonation of Delay Application in I.A. No. 633 of 2025 in Appeal No. 62 of 2025 on behalf of Respondent No. 3



**UNUC Legal LLP** <unuconsultants@gmail.com>  
to secy-moef, msdpcc, Shibani, info.juwmb, bcc: Pawan

17:45 (0 minutes ago)



Good evening,

Please find attached the reply to the condonation of delay application filed by the appellants in I.A. No. 633 of 2025 in Appeal No. 62 of 2025, served in advance on behalf of Respondent No. 3- M/s Jindal Urban Waste Management (Bawana) Ltd.

Kind Regards,



**UNUC LEGAL LLP**  
*Advocates & Solicitors*

**Delhi**

**Mumbai**

**Bhubaneswar**

**Lucknow**

**Dubai**

**Ahmedabad**

P-97,  
South Extension –  
II  
New Delhi -  
110049.

501, 5th Floor,  
Bayvue,  
New Marine Line  
East  
-400002

21(P), Kamla  
Niwas,  
Saheed  
Nagar  
Bhubaneswar  
- 751007

E-107, Lawyer  
Chamber,  
Allahabad High  
Court  
Lucknow-211017

2204, Single  
Business Tower  
Sheikh Zayed Road  
Business Bay, Dubai  
500001

B-601/602, Sankalp  
Iconic Tower,  
Off- S G Road & Iscon  
Bopal Ambli Road  
Sanidhya,  
Ahmedabad 380058

Reli  
Vi  
M:  
Ci  
Tel

**CONFIDENTIALITY NOTICE**