

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI.**

O.A. NO. 582 OF 2024

IN THE MATTER OF:

RAKESH KUMAR

... APPLICANT

VERSUS

THE UNION OF INDIA & ORS.

... RESPONDENTS
N.D.O.H.: 17.02.2025

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DELHI.
DATED:

Filed by:

Randhir
Surender
RANDHIR KUMAR & SURENDER SONI
ADVOCATES
COUNSELS FOR RESPONDENT NO.39

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI.**

O.A. NO. _____ OF 2024

IN THE MATTER OF:

RAKESH KUMAR

... APPLICANT

VERSUS

THE UNION OF INDIA & ORS.

... RESPONDENTS

REPLY ON BEHALF OF THE RESPONDENT NO.39

MOST RESPECTFULLY SHOWETH:

PRELIMINARY OBJECTIONS:

1. That the present application filed by the applicant is not maintainable and liable to be dismissed against the answering respondent as the same is nothing but an abuse of the process of law and has been filed by the appellant with illegal and malafide intention with a view to extort money by illegal means from the answering respondent.
2. That the present application filed by the applicant is not maintainable and liable to be dismissed as the

same is without any merits against the answering respondent.

3. That the present application is not maintainable and liable to be dismissed as the applicant has not come before this Hon'ble Court with clean hands and have concealed the material and vital facts from this Hon'ble Court thereby attempted to misguide and mislead the Hon'ble Court. Whereas the fact remains that the answering respondent has not violated any law of the Air (Prevention and Control of Pollution Act, 1981) and Environment Protection Law.

4. That the applicant has not filed or placed on record a single document or any material evidence in support of the allegations against the answering respondent and to show that the answering respondent has committed any breach of law.

However, no relief is prayed for in the present application against the answering respondent.

5. That it is pertinent to mention here that the answering respondent is a small industry of manufacturing juice and beverage by following all rules and regulations issued by the State Pollution Control Board Haryana. The answering respondent has limited work of four months in a year during summer season and the remaining eight months the work of the answering respondent remains closed. There are about 15 employees employed with the answering respondent.
6. That in summer season juices and beverages are manufactured through green and clean energy by the respondent i.e. by using electricity, biogas and CNG which do not cause any pollution. Therefore, the answering respondent has not violated any provisions of law or rules and regulations issued by the concerned authority as well as State

Government to control the pollution. Thus, the present application deserves to be dismissed.

7. That neither any survey nor any inspection has ever been conducted at the premises of the answering respondent by any authority regarding violation of pollution norms nor the concerned authority has ever issued any show cause notice to the answering respondent in respect of the subject matter of the present application. No samples have ever been taken by any authority including the applicant to prove that the answering respondent is causing pollution. It is pertinent to mention here that Section 26 of the Air (Prevention and Control of Pollution) Act, 1981 states regarding power to take samples of air or emission and procedure to be followed in connection therewith. As per Section 28 of the said Act, the samples are required to be sent to the State Air Laboratories for analysis or tests, but in the present case, the said process has not

been followed, therefore, the present application is liable to be dismissed.

8. The present application is based on false, frivolous and baseless facts which have no iota of truth and the same is liable to be dismissed at the threshold.
9. That the present application does not disclose as to what manner and through which equipments/fuels etc. the answering respondent is emitting pollution. Therefore, the present application is liable to be dismissed against the answering respondent.
10. That the present application filed by the applicant is not maintainable and liable to be dismissed as no cause of action has arisen in favour of the applicant and against the answering respondent.

REPLY ON MERITS:

1. That para No.1 of the application is denied for want of knowledge.

2. That para No.2 of the application needs no reply being matter of record.
3. That para No.3 of the application needs no reply being matter of record.
4. That para No.4 of the application needs no reply being matter of record.
5. That para No.5 of the application needs no reply being matter of record.
6. That para No.6 of the application needs no reply being matter of record.
7. That para No.7 of the application needs no reply being matter of record.
8. That in reply to para No.8 of the application, it is submitted that the present application is based on false, frivolous, baseless and concocted facts and the answering respondent has nothing to do with the allegations made in the present

application because the answering defendant has not done any of causing or emitting any pollution.

9. That para No.9 of the application is wrong, false and denied. It is submitted that the present application is filed by the applicant in order to harass the answering respondent in a false litigation. The answering respondent is being dragged into this false litigation without any involvement and no documentary proof to prove the indulgence of the answering respondent in the present matter is put on record.
10. That para No.10 of the application is wrong, false and denied. It is submitted that the answering respondent has limited work only for four months of summer season in a year and for rest of the period the work of the answering respondent remains closed. Therefore, the allegations made in the para under reply are false, baseless and concocted.

11. That para No.11 of the application is wrong, false and denied. As the present application is based on false, frivolous and concocted facts, therefore no orders are required to be passed against the answering respondent.

REPLY TO BRIEF FACTS:

1. That para No.1 of the application needs no reply. However, the applicant is put to strict proof thereof.
2. That para No.2 of the application needs no reply. However, the applicant is put to strict proof thereof.
3. That para No.3 of the application needs no reply. However, the applicant is put to strict proof thereof.
4. That para No.4 of the application needs no reply. Regarding the facts relating to the law laid down by the Hon'ble Apex Court are matters of record.

5. That para No.5 of the application needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Commission are matters of record.
6. That para No.6 of the application needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Commission or Tribunal are matters of record.
7. That para No.7 of the application needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Tribunal are matters of record.
8. That para No.8 of the application needs no reply. However, the applicant is put to strict proof thereof.
9. That para No.9 of the application needs no reply. However, the applicant is put to strict proof thereof.
10. That para No.10 of the application needs no reply. However, the applicant is put to strict proof thereof.

11. That para No.11 of the application needs no reply. However, the applicant is put to strict proof thereof.
12. That para No.12 of the application needs no reply. However, the applicant is put to strict proof thereof.
13. That in reply to para No.13 of the application, it is submitted that the answering respondent is following the orders passed by the Hon'ble Courts and Tribunals in running his business.
14. That in reply to para No.14 of the application, it is submitted that the answering respondent is following the orders passed by the Hon'ble Courts and Tribunals in running his business. However, the work of the answering respondent remains closed in winter season and the answering respondent runs its business activities only for four months of summer season.

15. That para No.15 of the application needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Apex Court are matters of record.
16. That para No.16 of the application needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Apex Court are matters of record. However, it is submitted that the business of the answering respondent runs only four months of summer seasons by following all rules and regulations/guidelines issued by the concerned authorities and complying with the orders of the Hon'ble Apex Court and Tribunals.

REPLY TO GROUNDS:

- A. That this ground needs no reply. However, the application is put to strict proof thereof.
- B. That this ground relates to the concerned Authorities, therefore, needs no reply.

- C. That this ground needs no reply as the same relates to respondent No.5. However, the application is put to strict proof thereof.
- D. That this ground needs no reply as the same relates to respondent No.5. However, the application is put to strict proof thereof.
- E. That this ground needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Tribunal, the same are matters of record.
- F. That this ground needs no reply. Regarding the facts relating to the orders passed by the Hon'ble Tribunal, the same are matters of record.
- G. That in reply to this ground it is submitted that the answering respondent is following all rules and regulations issued by the Hon'ble Tribunal and the State Pollution Control Board as well as Central Pollution Control Board and other concerned

authorities, in running its business as submitted in foregoing paras of the reply. Therefore, no orders/directions are required to be passed against the answering respondent.

- H. That this ground needs no reply. However, the applicant is put to strict proof thereof.
- I. That this ground needs no reply. Regarding the facts relating to the orders/law passed and laid down by the Hon'ble Apex Court, the same are matters of record.
- J. That this ground needs no reply. Regarding the facts relating to the orders/law passed and laid down by the Hon'ble Apex Court, the same are matters of record.
- K. That this ground needs no reply. However, the applicant is put to strict proof thereof.

Para regarding jurisdiction, it is submitted that the Hon'ble Court has no jurisdiction to try, decide and entertain the present petition as business/work place of the answering respondent is located in Hissar, Haryana.

Para regarding limitation and cause of action, it is submitted that no cause of action ever arose in favour of the applicant and against the answering respondent and the present application is barred by law of limitation.

The prayer clause of the application is wrong, false and denied. It is submitted that in view of the above submissions, the applicant is not entitled to any relief as alleged in the petition against the answering respondent.

In view of the facts set out herein above, and the submissions made herein above, the applicant is not entitled to any relief as alleged against the answering respondent. It is most respectfully prayed that this Hon'ble Court be pleased to dismiss the present

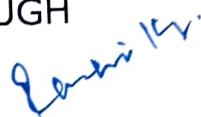
application with exemplary cost against the answering respondent.


RESPONDENT NO.39

DELHI.

DATED:

THROUGH



RANDHIR KUMAR & SURENDER SONI
ADVOCATES
COUNSELS FOR RESPONDENT NO.39

VERIFICATION:

Verified at Hissar on this ___ day of January, 2025 that the contents of the reply to the application are true and correct to my knowledge and those of paras No.1 to 10 of the preliminary objections are based upon legal information received and believed to be true. Last Para is prayer to this Hon'ble Court.


RESPONDENT NO.39

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
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O.A. NO. _____ OF 2024

IN THE MATTER OF:

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VERSUS

THE UNION OF INDIA & ORS. ... RESPONDENTS

AFFIDAVIT

I, Surender S/o Sadhu Ram, authorized signatory of M/s Sapna Beverages Industry, Depal Road, Prem Nagar, Hansi, Hisar Haryana, do hereby solemnly affirm and declare as under:-

1. That I am the authorized signatory respondent No.39 in the above noted application and am well conversant with the facts of the case and as such competent to swear this affidavit.

2. That the accompanying reply to the application has been drafted by counsel for the respondent No.39 under its instructions and the contents thereof have



been read over and explained to me in vernacular and after understanding the contents of the same, I state that the same are true and correct to my knowledge derived from the records. The contents of the accompanying reply to the application may be read as part and parcel of this affidavit and the same are not being repeated herein for the sake of brevity.


DEPONENT

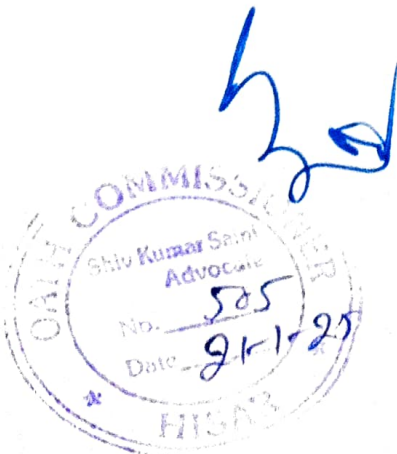
VERIFICATION:-

Verified at Hissar on this ___ day of January, 2025 that the contents of the above affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.


DEPONENT

Certified that the contents declared on oath before me on 21 of 2025 at HSR who is known to me by Sh. Subender Singh. Certified further that this affidavit has been read & explained to the deponent who declared perfectly to understand the same at the time making thereof.


 Oath Commissioner, HISSAR



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THE UNION OF INDIA & ORS. ... RESPONDENTS
N.D.O.H.: 17.02.2025

LIST OF DOCUMENTS

1. Authorization letter made by the respondent company in favor of the respondent.
2. Copy of Aadhar Card
3. Copy of Udyam Registration Certificate.
4. GST Registration Certificate

DELHI.

DATED:

THROUGH



RANDHIR KUMAR & SURENDER SONI
ADVOCATES
COUNSELS FOR RESPONDENT NO.39

.06CCKPS4536B2ZL
No.: 10018064001431**M/s SAPNA BEVERAGES INDUSTRY**PREM NAGAR, HANSI-125033 DISTT. HISAR (HARYANA)
EMAIL: info@sapnabeverage.com & www.sapnabeverage.com
Toll Free Number: 1800-532-9000

19

Ref. 08/2025

Dated. 3rd Jan, 2025

To whom it may concern:

Today on dated: 3rd of January, 2025, at 10:30 a.m. Board of Directors meeting has been held in which Board of Directors appointed to Mr. Surender S/o Sadhu Ram as Authorized Signatory of Sapna Beverages Industry to file Vakalatnama, Reply, Affidavit of Evidence along with all other Legal Work in the Legal case titled as Rakesh Kumar Versus Union Of India & ors. on behalf of Company i.e. FTHN Healthcare Products Pvt. Ltd.

Managing Director,

Surender,

Sapna Beverages Industry

Prop.

भारत सरकार
Government of India

Surender
DOB 04/03/1985
Male

आम आदमी का अधिकार

[Handwritten signature]

भारतीय विशिष्ट पहचान प्राधिकरण
Unique Identification Authority of India

Address: S/O: Sadhu Ram,
Qutabpur(115), Qutabpur, Hisar,
Haryana, 125044

1947
1800 300 1947

help@uidai.gov.in

www.uidai.gov.in



365

Government of India

सूक्ष्म, लघु एवं मध्यम उद्यम मंत्रालय

Ministry of Micro, Small and Medium Enterprises

**UDYAM REGISTRATION CERTIFICATE**

21

UDYAM REGISTRATION NUMBER

UDYAM-HR-06-0007870

NAME OF ENTERPRISE

SAPNA BEVERAGES INDUSTRY

TYPE OF ENTERPRISE *

SNo.	Classification Year	Enterprise Type	Classification Date
1	2023-24	Small	09/05/2023
2	2022-23	Small	26/06/2022
3	2021-22	Small	11/06/2021

MAJOR ACTIVITY

MANUFACTURING

SOCIAL CATEGORY OF ENTREPRENEUR

OBC

NAME OF UNIT(S)

S.No.	Udyog Aadhaar Memorandum	Unit(s) Name
1	HR06B0007740	SAPNA BEVERAGES INDUSTRY
2	HR06B0007853	SAPNA BEVERAGES INDUSTRY

OFFICAL ADDRESS OF ENTERPRISE

Flat/Door/Block No.	0	Name of Premises/ Building	Depal road prem nagar
Village/Town	Hansi	Block	Hansi
Road/Street/Lane	Depal road	City	Hansi
State	HARYANA	District	HISAR , Pin 125033
Mobile	9034452418	Email:	surenderlambor1985@gmail.com

DATE OF INCORPORATION / REGISTRATION OF ENTERPRISE

01/02/2010

DATE OF COMMENCEMENT OF PRODUCTION/BUSINESS

01/02/2010

NATIONAL INDUSTRY CLASSIFICATION CODE(S)

SNo.	NIC 2 Digit	NIC 4 Digit	NIC 5 Digit	Activity
1	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11041 - Manufacture of aerated drinks	Manufacturing

2	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11042 - Manufacture of synthetic flavoured concentrates and syrups	Manufacturing
3	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11045 - Manufacture of soft drinks	Manufacturing
4	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11049 - Manufacture of other non- alcoholic beverages n.e.c.	Manufacturing

DATE OF UDYAM REGISTRATION

11/06/2021

* In case of graduation (upward/reverse) of status of an enterprise, the benefit of the Government Schemes will be availed as per the provisions of Notification No. S.O. 2119(E) dated 26.06.2020 issued by the M/o MSME.

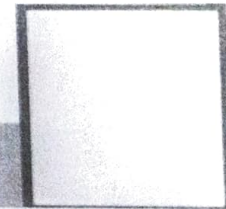
Disclaimer: This is computer generated statement, no signature required. Printed from <https://udyamregistration.gov.in> & Date of printing:-
24/08/2023

For any assistance, you may contact:

1. District Industries Centre: HISAR (HARYANA)
2. MSME-DFO: KARNAL (HARYANA)

Visit : www.msme.gov.in ; www.dcmsme.gov.in ; www.udyamregistration.gov.in

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भारत सरकार
Government of India
सूक्ष्म, लघु एवं मध्यम उद्यम मंत्रालय
Ministry of Micro, Small and Medium Enterprises



Udyam Registration Number : UDYAM-HR-06-0007870

Type of Enterprise	SMALL	Major Activity	Manufacturing
Type of Organisation	Proprietary	Name of Enterprise	SAPNA BEVERAGE INDUSTRY
Owner Name	SHRI SURENDER	PAN	CCKPS4536B
Do you have GSTIN	Yes	Mobile No.	9034452418
Email Id	surenderlambor1985@gmail.com	Social Category	OBC
Gender	Male	Specially Abled(DIVYANG)	No
Date of Incorporation	01/02/2010	Date of Commencement of Production/Business	01/02/2010

Bank Details

Bank Name	IFS Code	Bank Account Number
HDFC BANK LTD	HDFC0001731	50200058709953

Employment Details

Male	Female	Other	Total
5	0	1	6

Investment in Plant and Machinery OR Equipment (in Rs.)

S.No.	Financial Year	Enterprise Type	Written Down Value (WDV)	Exclusion of cost of Pollution Control, Research & Development and Industrial Safety Devices	Net Investment in Plant and Machinery OR Equipment [(A)-(B)]	Total Turnover (A)	Export Turnover (B)	Net Turnover [(A)-(B)]	Is ITR Filled?
1	2021-22	Small	21294504.00	0.00	21294504.00	103845788.00	0.00	103845788.00	Yes
2	2020-21	Small	26585095.00	0.00	26585095.00	84919941.00	0.00	84919941.00	Yes

2019-20	Small	24416273.00	0.00	24416273.00	118614328.00	0.00	118614328.00	Yes
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Unit(s) Details

SN	Unit Name	Flat	Building	Village/Town	Block	Road	City	Pin	State	I
1	SAPNA BEVERAGES INDUSTRY	NA	NA	PREM NAGAR		DEPAL ROAD	HANSI	125033	HARYANA	I
2	SAPNA BEVERAGES INDUSTRY	DEPAL ROAD	PREM NAGAR	HANSI		HANSI	HANSI	125033	HARYANA	I

Official address of Enterprise

Flat/Door/Block No.	0	Name of Premises/ Building	Depal road prem nagar
Village/Town	Hansi	Block	Hansi
Road/Street/Lane	Depal road	City	Hansi
State	HARYANA	District	HISAR , Pin : 125033
Mobile	9034452418	Email:	surenderlambor1985@gmail.com
Latitude		Longitude:	

National Industry Classification Code(S)

SNo.	Nic 2 Digit	Nic 4 Digit	Nic 5 Digit	Activity
1	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11041 - Manufacture of aerated drinks	Manufac
2	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11042 - Manufacture of synthetic flavoured concentrates and syrups	Manufac
3	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11045 - Manufacture of soft drinks	Manufac
4	11 - Manufacture of beverages	1104 - Manufacture of soft drinks; production of mineral waters and other bottled waters	11049 - Manufacture of other non-alcoholic beverages n.e.c.	Manufac

Are you interested to get registered on Government e-Market (GeM) Portal	Yes
Are you interested to get registered on TReDS Portals(one or more)	Yes
Are you interested to get registered on National Career Service(NCS) Portal	Yes
Are you interested to get registered on NSIC B2B Portal	N/A
Are you interested in availing Free .IN Domain and a business email ID	N/A

District Industries Centre

HISAR (HARYANA)

MSME-DFO

KARNAL (HARYAN

Date of Udyam Registration

11/06/2021

Date of Printing

24/08/2023



Government of India
Form GST REG-06
[See Rule 10(1)]

Registration Certificate

Registration Number :06CCKPS4536B2ZL

1.	Legal Name	SURENDER			
2.	Trade Name, if any	SAPNA BEVERAGES INDUSTRY			
3.	Constitution of Business	Proprietorship			
4.	Address of Principal Place of Business	depal road, hansi, hansi, Hisar, Haryana, 125033			
5.	Date of Liability	08/11/2017			
6.	Period of Validity	From	20/11/2017	To	NA
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority	Centre Goods and Services Tax Act, 2017			
Signature					
Name		Ajit Gidh			
Designation		Superintendent			
Jurisdictional Office		HR090			
9. Date of issue of Certificate		20/11/2017			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

This is a system generated digitally signed Registration Certificate issued based on the approval of the application by the jurisdictional tax authority



सत्यमेव जयते

GSTIN	06CCKPS4536B2ZL
Legal Name	SURENDER
Trade Name, if any	SAPNA BEVERAGEs INDUSTRY

Details of Additional Places of Business

Total Number of Additional Places of Business in the State	0
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सत्यमेव जयते

GSTIN	06CCKPS4536B2ZL
Legal Name	SURENDER
Trade Name, if any	SAPNA BEVERAGEs INDUSTRY

Details of Proprietor

1



Name	SURENDER
Designation/Status	proprietor
Resident of State	Haryana

**VAKALAT — NAMA**

In The Court of Hon'ble National Green Tribunal, Principal Bench, New Delhi
Rakesh Kumar V/s Union of India & Ors.

Know All to whom these present shall income that I/We Surender So. Randhir Kumar
 Auth. Sign: of Sapna Beverages Industry at Depal Road, Prem Nagar, Hansi, Haryana

Do here appoint

Surender Soni & Randhir Kumar,
Advocates,

En No. D- 1809/2001, D-3227/2011

Ch. No. 276, Old Block- IInd, Delhi High Court, New-Delhi
(M.) 98184-03688, 91234-16910

Email: soni.surenderk13@gmail.com

[Here in after called the advocate) to be my/our Advocate in the noted case and authorize him:- to act appear and plead in the above noted case in this court or in any other Court or tribunal in which the same may be tried or heard and also in the appellate Courts.

To Sign, file and present pleading, replications, appeals, cross objection or petitions or executions revision restoration withdrawals compromise or other petitions replies, objections or affidavits or other documents as may be deemed necessary proper for the prosecution of the said case in all stages.

To file and take back documents.

To Withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take out execution processing.

To appoint any other Legal Practitioner authorizing him to exercise the power and authorities hereby conferred upon the advocate whenever he may think fit do and to sign the power of attorney on out behalf.

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

And I/We the undertaken that I/We or my/our duly authorized agent would appear in Court on all hearing and will inform the advocate for appearance. When the case is called.

And I/We the undersigned to hereby agree not to hold the advocate or his substitute responsible for result of aid case in consequence of his absence from the Court when the said case is called up for hearing or for any negligence of said advocate or his substitute.

And I/We undersigned to hereby agree that in the event of the whole or one part of the fees 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 pad-up. If any costs are allowed for an adjournment the Advocate would be entitled to the same.

In the witness where of I/We do hereby set my/our hands to these presents of which have been understood by me/us this 3rd of January, 2025


 Advocate


 Client



Surender Soni <soni.surenderk13@gmail.com>

Reply on behalf of Respondents no. 26,38,39,45,49,57,90 in case no. OA No.582/2024

1 message

Surender Soni <soni.surenderk13@gmail.com>
To: pulkit Kapoor <pulkitkapoor099@gmail.com>

Wed, Jan 22, 2025 at 3:33 PM

Rakesh Kumar versus The Union Of India pending Before the Hon'ble National Green Tribunal, Principal Bench, New Delhi.


We refer to the matter above and confirm that we act for Respondents no. 26,38,39,45,49,57,90 in this matter.


The O.A. mentioned above is listed for hearing on 17-2-2025 at 10.00 am to answer the application and to file the written statement.

(Note: Pdf of Written Statement along with copy of documents is also attached with this email.)

Regards,

Attachments below:

 Respondent 57_compressed_compressed.pdf

 Respondent 90_compressed.pdf


5 attachments

 **Respondent 26.pdf**
5742K

 **Respondent 38.pdf**
5536K

 **Respondent 39.pdf**
6346K

 **Respondent 45.pdf**
5315K

 **Respondent 49_compressed.pdf**
2594K