

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
FARIDKOT HOUSE, COPERNICUS MARG, NEW DELHI**

**ORIGINAL APPLICATION NO. 1046 OF 2019**

**IN THE MATTER OF:**

MAHESH CHANDRA SAXENA

...APPLICANT

VERSUS

STATE OF UTTAR PRADESH & ORS.

...RESPONDENTS

**N.D.o.H: 02.12.2025**

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New Delhi  
Dated: 27<sup>th</sup> November 2025

RESPONDENT No. 4  
THROUGH



(Arvind Chaudhary)

Advocate

C-481A, Sushant Lok-I,  
Gurugram-122009 (Haryana)

Cell No. 9811108654

Email: arvindchaudhary@hotmail.com

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
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**N.D.o.H: 02.12.2025**

**REPLY ON BEHALF OF RESPONDENT NO. 4 i.e. M/s CANDOR  
TECHSPACE TO THE ORIGINAL APPLICATION FILED BY  
THE APPLICANT UNDER SECTION 14 READ WITH SECTION  
15, 17 AND 18 OF THE NATIONAL GREEN TRIBUNAL ACT,  
2010.**

**MOST RESPECTFULLY SHOWETH:**

**PRELIMINARY OBJECTIONS**

1. That the present Original Application is gross abuse of the process of this Hon'ble Tribunal and the same is based on false, frivolous and vexatious grounds and therefore liable to be dismissed with exemplary costs.

**PARA WISE REPLY**

1. That the contents of para no.1 of the Original Application under reply are a matter of record and hence need no reply.

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2. That the contents of para No. 2 of the Original Application under reply are a matter of record and hence need no reply.

3. That the contents of para No. 3 of the Original Application under reply are a matter of record and hence need no reply.

4. **REPLY TO THE FACTS:**

4(i) to (vi) That the contents of para No. 4 (i) to 4(vi) of the Original Application under reply do not pertain to the answering respondent and hence need no reply.

4(vii) That the contents of para No. 4(vii) of the Original Application under reply pertaining to the answering respondent are wrong and denied. It is denied that the applicant has placed on record any deficiencies in the rainwater harvesting system constructed by the answering respondent. It is wrong and denied that there are any discrepancies in the rainwater harvesting system constructed by the answering respondent. It is wrong and denied that the depth of the recharge borewell is 30 meters whereas static water table is around 15 meters, at the answering respondent's premises at Gautam Budh Nagar. It is also denied that the recharge borewell is full of sand or other impurities or that the rainwater harvesting system is dysfunctional. Further, the compliance report prepared and submitted by officials of CPCB, UPPCB, CGWA, NOIDA Authority, UP Jal Nigam in presence of the petitioner, pursuant to the order passed by the Hon'ble Tribunal does not indicate any discrepancy with respect to the rainwater harvesting system of the answering respondent and specifically states that the design and

operation of the rainwater harvesting structures are as per the applicable guidelines. It is respectfully submitted that the answering respondent is a law-abiding company and is conducting its business in compliance with all the applicable laws including those related to protection of our environment.

4(viii) That the contents of para No. 4(viii), incorrectly numbered as '4(v)' of the Original Application under reply do not pertain to the answering respondent and hence needs no reply.

4(ix) That the contents of para No. 4(ix), incorrectly numbered as '4(vi)' of the Original Application under reply is a matter of record and hence needs no reply.

4(x) That the contents of para No. 4(x), incorrectly and repeatedly numbered as '4(vi)' of the Original Application under reply is a matter of record and hence needs no reply.

4(xi) That the contents of para No. 4(xi), incorrectly numbered as '4(vii)' of the Original Application under reply is a matter of record and hence needs no reply.

4(xii) That the contents of para No. 4(xii), incorrectly numbered as '4(viii)' of the Original Application under reply is a matter of record and hence needs no reply.

5. That the contents of para No. 5 of the Original Application under reply are wrong and denied. It is wrong and denied that the applicant

has raised numerous grounds which entitles him to file the present application.

### REPLY TO THE GROUNDS

A&B. That the contents of para Nos. 'A' and 'B' of the Grounds does not pertain to the answering defendant and hence needs no reply.

C. The contents of para No. 'C' of the Grounds are wrong and denied. It is wrong and denied that there has been any contamination of the ground water due to any of the acts of the answering respondent resulting in contamination of rainwater.

D-F. That the contents of para Nos. 'D' to 'F' of the grounds are a matter of records and hence needs no reply. It is however clarified that the answering respondent is not violating any of the Acts or rules with respect to NGT Act and Environment Protection laws.

G-I. That the contents of para Nos. 'G' to 'I' of the Grounds need no reply. It is reiterated at the cost of repetition that the answering respondent is not violating any of the Acts or rules with respect to NGT Act and Environment Protection laws.

J. That the contents of para No. 'J' of the Grounds are a matter of records and hence needs no reply.

6. That the contents of para No. 6 of the Original Application under reply are a matter of record and hence needs no reply.

The prayer clause to the application is strongly opposed.

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**PRAYER**

In view of what has been submitted herein above, it is therefore most respectfully prayed that this Hon'ble Court may be pleased to dismiss the present application with exemplary costs.

Any other or further order, direction or relief as this Hon'ble Court may deem just, fit, and proper in the facts and circumstances in the present case may also be passed in favour of respondent No. 4 and against the applicant.

New Delhi  
Dated: 26<sup>th</sup> November 2025



(Arvind Chaudhary)  
Advocate  
C-481A, Sushant Lok-I,  
Gurugram-122009 (Haryana)  
Cell No. 9811108654  
Email: arvindchaudhary@hotmail.com

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
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**ORIGINAL APPLICATION NO. 1046 OF 2019**

**IN THE MATTER OF:**

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**AFFIDAVIT**

I, Shivansh Singh, aged about 41 years, Authorised Representative, M/s Candor Tech Space, having its office at Plot No. 20-2, Sector 135, NOIDA, Gautam Budh Nagar-201305, presently at New Delhi, do hereby solemnly affirm and declare as under:

1. I state that I am the duly authorized representative of respondent No. 4 in the present case and am sufficiently conversant with the facts of the present case and have examined the relevant records and documents in relation thereto to depose in the matter.
2. That the contents of the accompanying reply to the original application under section 14, 15, 17 & 18 of the NGT Act, 2010 along with the present affidavit are true and correct and have been read over and explained to me in vernacular. The same may be read as part of this affidavit and the contents thereof are not repeated herein for the sake of brevity.



  
DEPONENT

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**VERIFICATION:**

Verified on this 26<sup>th</sup> day of November 2025 at New Delhi that the contents of the paras 1 and 2 of the above affidavit are and correct to my knowledge. No part of it is false and nothing has been concealed therefrom.

*Identify the deponent who has signed in my presence*

*[Signature]*  
DEPONENT

The Seal of Oath Commissioner  
S.L. No. 49/2025  
LALIT KUMAR  
App. By High Court  
Period 28/11/2025  
to 14/07/2027  
Tis Hazari Court, Delhi-110054

IDENTIFIED THAT THE DEPONENT  
Shri/Smt./Kni... *[Signature]*  
S/o W/o D/o... *[Signature]*  
R/o... *[Signature]*  
Identified by... *[Signature]*  
was sworn on... 27 NOV 2025  
at... *[Signature]*  
that the contents of the affidavit have  
been read and explained to the deponent  
and he has declared that the contents are  
correct to his knowledge.

Oath Commissioner Delhi

27 NOV 2025

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BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, FARIDKOT HOUSE, COPERNICUS MARG, NEW DELHI ORIGINAL APPLICATION NO. 1046 OF 2019

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...RESPONDENTS

VAKALATNAMA

KNOW ALL to whom these presents shall come that I, M/s Candor Techspace, having its office at Plot No. 20-21, Sector 135, NOIDA, Gautam Budh Nagar, through its duly authorized signatory, Sh. Shivansh Singh, the above-named RESPONDENT NO. 04, do hereby appoint:

ARVIND CHAUDHARY, ADVOCATE (D/912/94) SACHIN CHAUDHARY, Adv. C-481A, SUSHANT LOK-I, GURUGRAM-122009, HARYANA D/8878/22 Mobile No. 0981118654, email:arvindchaudhary@hotmail.com

(hereinafter called the Advocate(s) to be my Advocate in the above-named case authorise 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 claims for executions, review, revision, withdrawal, compromise or other claims or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage.

To file and take back documents to admit and/or deny the documents of opposite party.

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

To take execution proceedings.

To deposit, withdraw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other Legal Practitioner 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 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 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 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 for a period of three years only I/We hereby agree that once the fees is paid, I/We will not be entitled for the refund of the same in any case.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which been understood by me/us on this 26th Day of November 2025.

Accepted subject to the terms of the fees.

Advocate

Client

Handwritten signatures of Advocate and Client



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**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE BOARD OF DIRECTORS OF SEAVIEW DEVELOPERS PRIVATE LIMITED HELD ON SUNDAY, 04<sup>TH</sup> MAY, 2025 AT 5:30 P.M AT BUILDING NO. 5A, CANDOR TECHSPACE, IT/ITES SEZ, SECTOR-48, GURUGRAM-122018**

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**TO CONSIDER AND APPROVE THE MODIFICATION IN AUTHORIZATION TO DEAL WITH LEGAL MATTERS OF THE COMPANY**

**"RESOLVED THAT** in supersession of the earlier resolution(s), if any, passed by the Board of Directors of the Company in respect of legal matters, the consent of the Board be and is hereby accorded to authorize the following official(s)/person(s) (collectively referred to as **"Authorised Signatories"**) namely:

1. Mr. Sanjay Yadav
2. Ms. Ruhi Goswami
3. Mr. Saurabh Jain
4. Ms. Smeeksha Bhola
5. Mr. Shivansh Singh

to do the following acts, deeds and things, jointly and/or severally as may be required, for and on behalf of the Company:

(a) To institute, defend, prosecute, conduct, pursue, compound, settle, withdraw or comprise legal or other proceedings, claims and disputes by or against or in which there is a concern or interest before any court, tribunal, judicial or quasi-judicial bodies, arbitrator, conciliator, Government or regulatory authorities or any other forum.

(b) To accept service of any writ, summons or other legal notices/ processes and/or to appear and to represent in any courts or tribunals or NCLT or judicial or quasi-judicial bodies or revenue authorities or administrative bodies or executive officers and/or before all other Government or regulatory authorities including municipal, industrial, labour, tax authorities, and other bodies whatsoever, as the said attorney may think fit, or otherwise, as may be necessary to commence any action, suit, claim, complaint, reply, appeal, petition, settlement, arbitration or other proceedings in any court, judicial or quasi-judicial bodies, revenue authorities, industrial bodies, labour judicial bodies, revenue authorities, industrial bodies, labour bodies, or any other officer, body, authority or tribunal for any reliefs, declaration, right, title, interest, property, matter or thing wherein there is any interest or concern by any means or any account whatsoever or otherwise in relation to any of the affairs, property and business or in which the company, may be or may be deemed to be necessary as a party and the same action, suit, claim, reply, complaint, appeal, petition or proceedings to prosecute or discontinue, or to become non-suit therein, if the said attorney shall think fit or be advised and to take all execution and other proceedings and also to take such other lawful ways, means or steps for the enforcement, realization or possession of any relief's, rights, interests, claims, demands or property in relation to any of the properties, affairs and business whatsoever, to which the said attorney, may consider to be entitled or which may be considered to be due, owing or belonging by or from any person(s), firm or company whatsoever.

(c) To join with any other party as a part to any action, suit, complaint, petition, appeal or other legal proceeding whether as plaintiff or complainant or defendant or appellant or respondent and to interplead, claim set-off or make a counter claim, and to issue or cause to be issued third party notices.

(d) To appoint one or more attorneys to grant powers and authorities as are conferred by this resolution.

**Seaview Developers Private Limited**

**Registered Office:** F-83, Profit Centre, Gate No. 1, Mahavir Nagar, Near Pizza Hut, Kandivali (W) Mumbai 400067, Maharashtra.

**Site Office:** IT/ITES SEZ, Candor TechSpace, Plot No. 20 & 21, Sector - 135, NOIDA - 201304, Uttar Pradesh

**T:** +91-124-3821400, **E:** candorlegal@brookfield.com **CIN:** U70101MH2005PTC281178

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(e) To engage advocates, legal practitioners, chartered accountants, company secretary or any other professional(s) or any person as may be required and to delegate power and authorize such person as conferred by this resolution and to sign vakalatnamas, authority letter, power of attorney as may be required for this purpose.

(f) To do and execute all such acts, deeds or things as they may think fit or necessary and/or incidental to the above purposes including any legal proceedings, day-to-day conduct of the business related to such Laws; and

(g) To do all such other acts, deeds and things, which are necessary, incidental to and deem fit by the said attorney in respect of the above matters.

**RESOLVED FURTHER THAT** all acts, deeds, things, matters, etc. as afore-stated shall be deemed to be valid and enforceable only if they are consistent with the instant resolution as may be relevant in this case and that the Board shall not be responsible for any illegal and invalid acts and any acts beyond the scope of the afore-stated powers done by the said persons and such invalid, illegal acts, and acts done beyond the scope of powers granted in this resolution shall not bind the Company against any third parties or before any authorities in any manner and that the Board shall not be answerable in that behalf.

**RESOLVED FURTHER THAT** any of the above Authorised Signatories be and are hereby severally authorized to sub-delegate the above authority in favour of any person by way of authority letter or power of attorney as may be required or considered necessary from time to time.

**RESOLVED FURTHER THAT** the aforesaid powers granted to above-mentioned persons shall be valid and effective unless revoked earlier by the Board.

**RESOLVED FURTHER THAT** a copy of this resolution duly certified by any of the Directors of the Company be furnished to anyone concerned or interested in the matter."

**Certified True Copy  
For SEAVIEW DEVELOPERS PRIVATE LIMITED**

**SMEEKSH** Digitally signed by  
SMEEKSHA BHOLA  
**A BHOLA** Date: 2025.11.11  
15:05:24 +05'30'

**Smeeksha Bhola  
Director  
DIN: 10505637**

**Seaview Developers Private Limited**

**Registered Office:** F-83, Profit Centre, Gate No. 1, Mahavir Nagar, Near Pizza Hut, Kandivali (W) Mumbai 400067, Maharashtra.

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**T:** +91-124-3821400, **E:** candorlegal@brookfield.com **CIN:** U70101MH2005PTC281178

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, FARIDKOT HOUSE,  
COPERNICUS MARG, NEW DELHI ORIGINAL APPLICATION NO. 1046 OF 2019**

1 message

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**Sachin Chaudhary Advocate** <sachinchoudhary.co.in@gmail.com>

28 November 2025 at 15:19

To: R K <rkjust25@gmail.com>, Arvind Chaudhary <arvindchaudhary@hotmail.com>

**IN THE MATTER OF:**

-  
MAHESH CHANDRA SAXENA ...APPLICANT

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STATE OF UTTAR PRADESH & ORS. ...RESPONDENTS

**REPLY ON BEHALF OF RESPONDENT NO. 4 i.e. M/s CANDOR TECHSPACE  
TO THE ORIGINAL APPLICATION FILED BY THE APPLICANT UNDER  
SECTION 14 READ WITH SECTION 15, 17 AND 18 OF THE NATIONAL  
GREEN TRIBUNAL ACT, 2010.**

**PLEASE FIND THE ATTACHMENT.....**

**REGARDS**

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 **NGT reply.pdf**  
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