

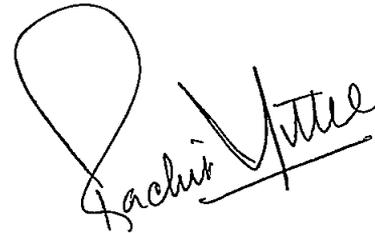
**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 1400 OF 2024  
IN THE MATTER OF:  
DEVENDRA FAUJDAR ...APPLICANT  
VERSUS  
STATE OF UTTAR PRADESH & ORS. ...RESPONDENTS**

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DATE: 18.08.2025  
NEW DELHI

THROUGH:



(RACHIT MITTAL)  
ADVOCATE FOR THE RESPONDENT NO. 6  
RM Law Chambers  
MZ- 24 & 25, Ansal Fortune Arcade,  
Sector 18, Noida, U.P. – 201 301  
Contact No.: 0120- 4998794  
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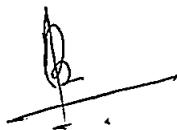
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ORIGINAL APPLICATION NO. 1400 OF 2024  
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REPLY ON BEHALF OF RESPONDENT NO. 6, I.E. MATHURA  
VRINDAVAN DEVELOPMENT AUTHORITY, TO THE  
APPLICATION FILED BY APPLICANT

MOST RESPECTFULLY SHOWETH: -

PRELIMINARY SUBMISSIONS: -

1. That the present Reply is being filed by the Mathura Vrindavan Development Authority (hereinafter referred to as "*Answering Respondent/Respondent No. 6/MVDA*") to the Application bearing O.A. No. 1400 of 2024 filed by Devendra Faujdar (hereinafter referred to as "*Applicant*") under Section 18(1) read with Sections 14 & 15 of the National Green Tribunal Act, 2010 (hereinafter referred to as "*Act*") seeking necessary directions.
2. At the outset, the Answering Respondent denies all the averments made in the Application filed on behalf of the Applicant to the extent they are contrary or inconsistent with the contents of the Reply.



Nothing contained in the Application filed by the Applicant should be deemed to have been admitted, save as expressly stated herein.

3. That the Application filed by the Applicant is replete with factual perversity and contains incorrect and misconceived submissions. It is submitted that the Applicant had pleaded incongruent averments and has based the Application on false surmise and vague conjectures. The Applicant has misleading and contradictory averments in his Application and has blatantly suppressed material facts with an intent to mislead this Hon'ble Tribunal. Hence, in view of the above, the Applicant is not entitled to any relief whatsoever.
4. That the Applicant has filed the present Application alleging a large-scale deforestation on account of illegal felling of more than 100 green trees and illegal mining of soil at his ancestral property admeasuring 8-10 acres, covered with wire fencing, by some miscreants of his village on 21.12.2024 who damaged the fencing by using big machineries and cut down more than 100 green trees situated at Village Syoba (Singa Patti), Magorra, Tahesil Goverdhan, District Mathura.
5. It is submitted that, as far as the incident of the illegal felling of trees and mining of soil is concerned, it does not fall under the jurisdiction of the answering Respondent. In contrast, the said incident pertains to the forest department (Respondent No. 8), and the forest department has taken/is taking the necessary actions.



6. It is most humbly submitted regarding the site in question that the village of the Applicant is a notified village vide notification no. 431/8-10-20-02/formation/04 Lucknow dated 15.12.2020. Further, it is pertinent to mention here that the area/village has been included in the Master Plan 2031.
7. It is to bring to the knowledge of this Hon'ble Tribunal that since the site in question has been included in a master plan, for any construction at the questioned site, there will be a requirement for a sanctioned map, prior to any construction. But till date, no application has been made by any individual to the answering Respondent for the sanctioning of the map qua the questioned site.
8. It is submitted that the answering respondent has always been vigilant in exercising its duties and fulfilling its responsibilities with due care and consciousness at all times and also has been complying with the orders/ directions passed by this Hon'ble Tribunal from time to time.

In light of the aforementioned submissions, it is respectfully prayed that the present application is not maintainable qua the answering Respondent



as the answering Respondent is not a necessary party to the present dispute.  
Thus, the answering Respondent may be deleted from the array of parties  
and/or the application may be dismissed.



**RESPONDENT NO. 06  
MATHURA VRINDAVAN DEVELOPMENT  
AUTHORITY**

**DATE: 18.08.2025  
PLACE: NEW DELHI**

**THROUGH:**



**(RACHIT MITTAL)  
ADVOCATE FOR THE RESPONDENT NO. 06  
RM Law Chambers  
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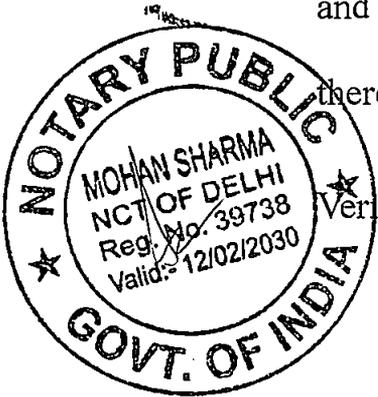


knowledge based on the records, contents whereof are not repeated for the sake of brevity and may be read as part and parcel of this affidavit. No part of it is false and nothing material has been concealed therefrom.

DEPONENT

**VERIFICATION**

I, the deponent hereinabove, do hereby verify and state that the contents of paras 1 to 2 of the Affidavit are true and correct to the best of my knowledge and belief derived from the official record and no part of it is false and nothing material has been concealed therefrom.



Verified and signed at New Delhi on 18<sup>th</sup> day of August, 2025.

18 AUG 2025

DEPONENT

CERTIFIED THAT THE DEPONENT  
Shri / Smt. / Km. Ashok Kumar  
S/o, W/o, D/o Late Shri. Meera Singh  
Identified by Shri Delvish Chivastava  
has solemnly affirmed before me at Delhi  
on 18/08/25 as Sl. No. 1  
That the contents of the affidavit which  
have been read & explained to me are  
true and correct to his knowledge

Notary Public

**ATTESTED**

NOTARY PUBLIC, DELHI  
GOVT. OF INDIA

I identify the deponent who has signed  
put thumb Impression in my Presence

IN THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 1400 OF 2024

IN THE MATTER OF

DEVENDRA FAUJDAR

...APPLICANT

VERSUS

STATE OF UTTAR PRADESH & ORS.

...RESPONDENT(S)

VAKALATNAMA

Know all to whom these presents shall come that I, Mathura Vrindavan Development Authority through its Vice Chairman/ Secretary do hereby appoint: Rachit Mittal Advocate, hereinafter called to be our Advocate in the above noted case and authorize them.

To act, appear and plead in the above noted case in this Court or in any other Court in which the same be tried or heard and also in the appellate Courts.

To sign, file verify and present pleadings, replications, appeals, cross-objections, or petitions for executions, review, revision, restoration, withdrawal, compromise or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages.

Revisor restoraries.

To file and take back documents.

To take out execution proceedings, to deposit, draw and receive money, cheques and grant receipts thereof or and to do all other acts and things which may be necessary to be done for the progress and in the course of prosecution of the said case.

To appoint, instruct any other Legal practitioner authorising him to exercise the power and authorities hereby conferred upon the Advocates whenever he or they may think fit to do so and sign, the power of attorney on my/our behalf.

IN WITNESS WHEREOF, We do hereunto set our hand to these present the contents of which have been understood by us this 18<sup>th</sup> day of May 2025.

Accepted:



Rachit Mittal  
Advocate  
(D/1041/2011)



सचिव  
CLIENT  
मथुरा-वृन्दावन विकास प्राधिकरण  
मथुरा



RM LAW CHAMBERS®

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