

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI
(ORIGINAL JURISDICTION)**

I.A No. 542 of 2024

IN

ORIGINAL APPLICATION NO. 1270 OF 2024

IN THE MATTER OF

IMRAN ALI

... APPLICANT

VERSUS

MINISTRY OF ENVIRONMENT,

GOVT. OF UTTAR PRADESH & ORS

... RESPONDENTS

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Place: New Delhi

Dated: 15.01.2026

Through



SAURABH AJAY GUPTA

Advocate for Respondent No. 8

Chamber No. 79, A. K. Sen Block

Supreme Court of India

New Delhi-110001.

chambersofsaaurabhajaygupta@gmail.com

9910297074

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**REPLY OF I.A. NO. 542 OF 2024 ON BEHALF OF
RESPONDENT NO. 8**

MOST RESPECTFULLY SHOWETH:

1. That I Sanjeev Kumar Verma, aged about 57 Years, s/o Sh. Shriyansh Prakash Verma, r/o Moh- Chauhanan, Kiratpur, Bijnor, Uttar Prtadesh – 246731, director of Garnish Lands Pvt. Ltd., Respondent No. 8 herein in the aforesaid matter, and I have read the I.A No. 542 of 2024 filed by the Applicant and I am fully conversant with the facts of the case and competent to swear this Reply for and behalf of the Respondents No. 8 herein.

2. That at the outset, the Respondent deny all allegations and contentions raised in the Interim Application unless specifically admitted hereunder. For the sake of brevity, the Respondent rely on the contents of their detailed Counter Affidavit filed in the Original Application and request that the same be read as part and parcel of this reply.
3. That the allegations regarding encroachment, environmental damage, or illegal activities are unfounded and devoid of merit. The Ld. Civil Court (SD), Bijnor vide judgment and order dated 09.12.2015 passed in Civil Suit No. 586 of 2013 and Ld. District Court, Bijnor vide judgment and order dated 28.04.2018 passed in Civil Appeal No. 14 of 2018, observed that the land in question is not a pond or barren land as alleged and also, conclusively established the private ownership and lawful status of the land in question.
4. That the Respondent reiterate that permissions for construction were duly obtained from the Nagar Palika Parishad, Kiratpur, as annexed in the counter affidavit.
5. That the entries in the Khatauni of 1359 Fasli relied upon by the Applicant lack legal validity, as observed in the judgment

of the Ld. District Judge, Bijnor in his order dated 28.04.2018 passed in Civil Appeal No. 14 of 2018.

6. That it is humbly submitted that a Second Appeal No. 330 of 2020 concerning the land in question is currently pending before the Hon'ble High Court of Judicature at Allahabad.
7. That the Respondent categorically deny any destruction of natural resources or violation of environmental laws. The claims of the Applicant are speculative and unsupported by evidence.
8. That the Respondent disputes the claim that the balance of convenience lies in favor of the Applicant. On the contrary, halting the construction will result in unnecessary delays, financial loss, and inconvenience to the Respondent, who has acted in accordance with legal provisions. The Applicant has not demonstrated how the alleged convenience favors them over the Respondent.
9. That the Respondent contends that the present Application is neither bona fide nor in the interest of justice. It appears to be an attempt to hinder a lawful and duly approved project under the guise of protecting public interest. Such actions are detrimental to the Respondent and lack genuine merit.

10. That the Respondent refutes the claim that grave prejudice will be caused to the people living around the area if the Application is not allowed. The Respondent assert that the construction has been planned and executed with due regard to environmental and community welfare considerations. Conversely, the Respondent will suffer undue prejudice and hardship if the Application is allowed without substantiated grounds.

PRAYER

It is therefore, most respectfully prayed that this Hon'ble Tribunal may be pleased to:

a. Dismiss the Interim Application No. 542/2024 filed by the Applicant with cost as the same is bereft of any merits; and

b. Pass any other orders as deemed fit and proper in the facts and circumstances of the case.

Place: New Delhi

Dated: 15.01.2026

RESPONDENT NO. 8

Through



SAURABH AJAY GUPTA
Advocate for Respondent No. 8
chambersofsaurabhajaygupta@gmail.com
9910297074



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PRINCIPAL BENCH, NEW DELHI
(ORIGINAL JURISDICTION)

I.A No. 542 of 2024

IN

ORIGINAL APPLICATION NO. 1270 OF 2024

IN THE MATTER OF

Imran Ali

... Applicant

Versus

Ministry of Environment,

Govt. of Uttar Pradesh & Ors.

... Respondents

AFFIDAVIT

I, Sanjeev Kumar Verma, aged about 57 Years, s/o Sh. Shriyansh Prakash Verma, r/o Moh- Chauhanan, Kiratpur, Bijnor, Uttar Pradesh - 246731, do hereby solemnly affirm and state as under:

1. That I am the director of Garnish Lands Pvt. Ltd., Respondent No. 8 in the above-captioned matter and have read the I.A No. 542 of 2024 filed by the Applicant. I am fully conversant with the facts of the case and competent to swear this Affidavit for and behalf of the Respondent No. 8.
2. That the accompanying reply to the Stay Application filed by the Applicant have been drafted by the Counsel of the Answering Respondent under my instructions which are true and correct to the best of my knowledge.

Sanjeev Kumar Verma

3. That the accompanying reply has been filed in the interest of justice.

Handwritten signature

DEPONENT

VERIFICATION:

civil court's compound

Verified at *Bijnor* on this the 7th day of January, 2026 that the contents of the above Affidavit are true and correct to the best of my knowledge and belief, and nothing material has been concealed therefrom.

Handwritten signature
FAZI SAID
Advocate
Reg No. 10208298/96
G.P. No. 038872
No. C-03, District Session
Mob No. 99777

Handwritten signature
7/2026
DEPONENT
Handwritten notes and signature



saaurabh ajay <chambersofsaaurabhajaygupta@gmail.com>

Service Counter Affidavit and Reply to I.A. No 542 of 2024 on behalf of Respondent No.8 in OA No. 1270 of 2024 Titled "Imran Ali vs Ministry of Environment and Ors"

1 message

saaurabh ajay <chambersofsaaurabhajaygupta@gmail.com>

Fri, Jan 16, 2026 at 3:33 PM

To: imran.hrln@gmail.com, eonppkiratbi-up@nic.in, bhanwar jadona <bhanwar09jadon@gmail.com>, dmbij@nic.in, dharmnishad21@gmail.com, v.vlawassociates@gmail.com, sdmnazibabi-up@nic.in

PFA copy of Counter Affidavit and Reply to I.A. No. 542 of 2024 on behalf of Respondent No. 8 in OA No. 1270 of 2024 titled "Imran Ali vs Ministry of Environment"

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SAURABH AJAY GUPTA
Advocate
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2 attachments

 **COUNTER AFFIDAVIT R-8 OA 1270 of 2024.pdf**
11514K

 **R 8 Reply to IA No. 542 of 2024.pdf**
558K