

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI
ORIGINAL APPLICATION NO. 628/2024

IN THE MATTER OF:

ALOK MOHAN

...APPLICANT

VERSUS

HARYANA STATE POLLUTION CONTROL
BOARD & ORS.

...RESPONDENTS

N.D.O.H. 09.09.2025

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Priyesh Mohan Srivastava
 Counsel for Respondent No. 2
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 Email: priyeshmohansrivastava@gmail.com

Place: New Delhi

Date:06.09.2025

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI
ORIGINAL APPLICATION NO. 628/2024

IN THE MATTER OF:

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**RESPONSE ON BEHALF OF THE RESPONDENT NO. 2 TO THE
REPORT DATED 01.05.2025 AND SUPPLEMENTARY REPORT
DATED 28.08.2025 FILED BY THE RESPONDENT NO. 1 IN THE
CAPTIONED MATTER**

MOST RESPECTFULLY SHOWETH:

1. That at the outset, it is stated that the report dated 01.05.2025 filed by the Respondent No. 1 elaborately highlights the processes undertaken by the Respondent No. 2 in both the working units i.e., machining operations being undertaken by the Escorts Kubota Limited unit ('EKL'), which has been referred to as '*Plant-1*' in the report; and the tractor assembly and painting process being undertaken by the Escorts Kubota India Limited ('EKIL'), which has been referred as '*Tractor Assembly Plant*' in the report.
2. That it is stated that the supplementary report dated 28.08.2025 filed by the Respondent No. 1 also clearly states that as per the analysis reports, all tested parameters, including SPM, VOCs, and water quality indicators, are within the prescribed limits set by the Respondent No. 1.
3. That the reports filed by the Respondent No. 1 truthfully reflect the processes and compliances of the Respondent No. 2 effectively and the

said reports may be read as part and parcel of the present response, which are not being repeated herein for the sake of brevity.

4. That as have been already laid down in the latest reports, the Respondent No. 2 is already in process to comply with the recommendations suggested by the Respondent No. 1 in their report dated 12.09.2024 i.e., the purchase orders for acoustic enclosures have been issued, purchase orders for installation of Zero Liquid Discharge (ZLD) facility have been issued, which is set to be fully operational by 31.03.2026, and chemical process from the STP has been removed.
5. That the averments of the applicant are based out of surmises and conjectures without any proof to support its claim. Despite repeated reports filed by the Respondent No.1, the Applicant is seeking to engulf into a fishing and roving enquiry against the functioning of the Respondent No. 2 Company to facilitate its averments, which till now have proven to be frivolous and baseless.
6. That the comprehensive reports dated 01.05.2025 and 28.08.2025 filed by the Respondent No. 2 evidently discredit the erroneous claims of the Applicant.
7. That the present response may be read in addition to the reply filed by the Respondent No. 2 on 24.12.2024.



Priyesh Mohan Srivastava

Counsel for Respondent No. 2

C-200, LGF, Greater Kailash- 110048

Phone: + 91 9892786353

Email: priyeshmohansrivastava@gmail.com

Place: New Delhi

Date: 06.09.2025

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI
ORIGINAL APPLICATION NO. 628/2024

IN THE MATTER OF:

ALOK MOHAN

...APPLICANT

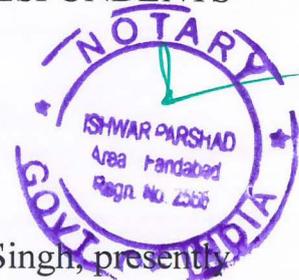
VERSUS

HARYANA STATE POLLUTION CONTROL BOARD & ORS.

Regd. Entry No.. 3719
 Dated.....

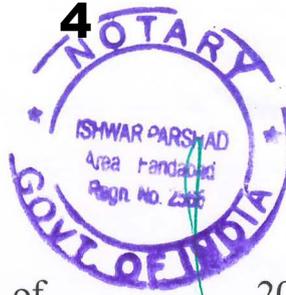
...RESPONDENTS

1 8 AUG 2025 | AFFIDAVIT



I, Shamsheer Singh, aged about 44 years, s/o Late Shri. Sammat Singh, presently working for gain at Escorts Kubota Limited as Senior Manager – Legal, do hereby solemnly affirm and declare as under: -

1. That I am the Authorized Representative of the Respondent No. 2 Company and am well conversant with the facts and circumstances of the present case and therefore I am competent to depose this affidavit.
2. That the accompanying response has been drafted by the counsel for the Respondent No. 2 under my instructions, the contents whereof have been read and understood by me, and that the same are true and correct.
3. That the documents annexed along with the present reply are true copies of their respective originals.



S. Beni
DEPONENT

VERIFICATION

Verified at Faridabad on 11 of 11, 2025 that the contents of the above affidavit are true and correct to the best of my knowledge and belief based on the records maintained by the Company. Nothing material has been concealed therefrom.

S. Beni
DEPONENT

Pradh
know the deponent
executant who has Signed
humb impression before me

Attested As -
Notary Public
Govt. of India

11 8 AUG 2025



Priyesh Mohan Srivastava <priyeshmohansrivastava@gmail.com>

Response on behalf of the Respondent No. 2 in OA No.628/2024 Alok Mohan Vs HSPCB & Ors.

1 message

Priyesh Mohan Srivastava <priyeshmohansrivastava@gmail.com>

Sat, Sep 6, 2025 at 8:08 PM

To: rkhuranalegal@gmail.com, aeronautengineer@gmail.com

Cc: Alok Mohan <alokmohan1954@yahoo.com>

Dear Sir,

Please find attached the response on behalf of the Respondent No. 2 in the captioned matter for your kind perusal.

Regards,

Priyesh Mohan Srivastava

Advocate on Record, Supreme Court of India

Office Address: C-200, LGF, Greater Kailash-1, New Delhi -110048**Email:** priyeshmohansrivastava@gmail.com**Mobile:** +91 9892786353

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**Reply to the report of HSPCB dated 01.05.2025.pdf**

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