

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BRANCHII, PUNE

ORIGINAL APPLICATION NO. 55 /2022

Mr. Kashinath Thakur Applicant

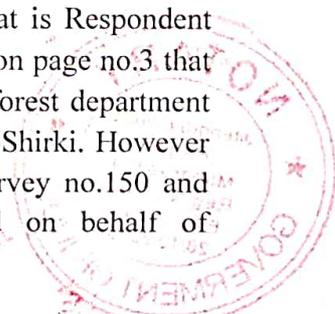
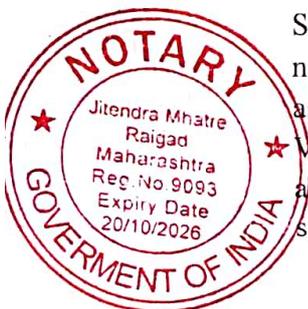
Vs

Grampanchayat Shirki & Ors. Respondents

**Say on behalf of Respondent No.1 on
the Amended Application of the
Applicant**

MAY IT PLEASE YOUR HONOUR

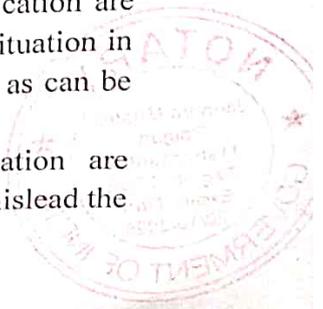
- A) The said Application is misconstrued and misleading hence the said application deserves to be rejected with cost.
- B) The said application is filed with intention to obstruct the constructive social work by defendant No. 1 for the benefit and convenience of the villagers at large, precisely for the welfare of small children hence, on that count also the said application deserves to be rejected forthwith.
- C) No cause of action has arisen for filling the said application hence the application deserves to be rejected on said preliminary issue.
- D) Respondent No.1 Submits that, the observations and findings as mention in para no. 3 of the Joint committee report which is carried out as per order of Hon'ble Tribunal. The observations of Joint committee report serial no.2 regarding gat no.15 of village Shirki the observations and findings there in are not admitted by Respondent No.1. It is pertinent to note that as per the orders of Hon'ble NGT court dated 30.05.2022 the observations and findings are to be submitted regarding survey no.152 situated in village Bori. However, the respected joint committee as gone beyond the scope of orders of Hon'ble court and observations are submitted regarding gat no. 15 which is situated under Respondent no.1 it is hereby submitted that the joint committee on its own accord has visited gat no. 15 of village Shirki which is under the Grampanchayat shirki that is Respondent no.1. The joint committee has stated in point no.02 on page no.3 that as per the remark in the panchanama made by the forest department Vadkhal the afore-mentioned gat no.15 is in village Shirki. However as per the land record alleged area is a part of survey no.150 and survey no.151 however it is humbly submitted on behalf of



respondent no.1 that the said Anganwadi is in distinct gat no.15 more over than that as per observation of joint committee also the said Anganwadi doesn't come in survey no. 152 where allegedly as per the complainant the Anganwadi is situated. Admittedly, construction of Anganwadi is in gat no.15 which is situated in Grampanchayat Shirki that is Respondent No.1. It is further stated that, prior to starting the construction work on the said place there was a Crematorium (Mhasan vata) for people of Hindu religion. The said construction was very old one and Assessment Extract No. 8 which is filed at Serial No.6 of the list of documents bearing no.302 C issued by the then Gram Panchayat Shirki in the year 1994. Thus, it is crystal clear, that there was old construction at the said spot in survey No.15, It is pertinent to note that as the new construction is done on exactly the same spot and foundation where the very old Mhasan Vata was situated hence no question arises of cutting any sort of Mangroves or any other Tree as there was naturally no any plant on the said old cement construction obviously because no mangroves can grow on a cement or a concrete place. Hence it is apparently seen that no any mangroves tree are cut as same foundation is utilized where previously a Crematorium (Mhasan vata) was in existence Hence considering the fact that newly constructed Anganwadi, the structure is built on the same foundation of that of previously constructed Crematorium (Mhasan vata) hence firstly Respondent no.1 state that no question of digging and cutting of trees of whatsoever nature is done and secondly it is stated that the newly constructed Anganwadi will be utilized for public welfare that is for small children of the village and Vicinity.

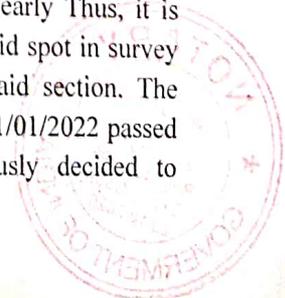
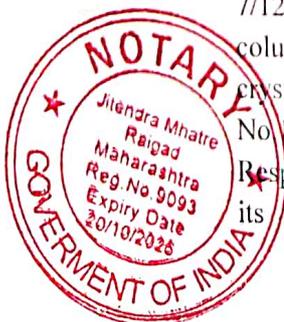
Without prejudiced to whatever stated above the paragraph wise detail say on behalf of Respondent No.1 on the amended application is as follows:

1. The contents of Para No. 3 (I) of the said application are concocted, frivolous and misleading in Toto. If the topographical location of the said vicinity is seen there are very scanty areas where Mangroves are under plantation. Hence, the contention of the Applicant that the said Villages Shirki and Bori are located near to the Shirki Creek is somewhat correct. However, the further contention of the Applicant that it is having vast areas having variety of Mangroves under plantation is false and hence not admitted by Respondent No.1. It is, pertinent, to note that the said Mangroves are naturally situated within a limited area of 15 to 20 Feets from the flowing Creek water.
 2. The contents of Para No. 3 (II) and (III) of the said application are admitted on behalf of the Respondent No.1. However the situation in the present facts and circumstances are altogether different as can be seen from the foregoing paragraphs of this say.
- The contents of Para No. 3 (IV) of the said application are enumerated with ill intention to suppress the true facts and mislead the



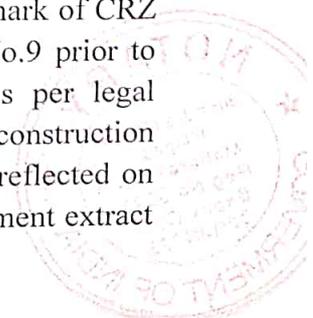
Hon'ble Court the Applicant ought to have gathered the true facts prior to commenting on the same. The Respondent No.1 is a responsible Gram Panchayat a Government Body represented by a Gram Sevak, who is a Government Officer. The said Gram Sevak is answerable to the Government Machinery. Hence, the said allegations by the Applicant that the Respondent No.1 has started construction of Anganwadi in the said NDZ in CRZ by cutting hundreds of tall and fully grown Mangroves and thereby is causing destruction of Mangroves Areas on large scale is unwarranted and the said allegations are made by the Applicant with vengeance and inspired with ulterior motive to gain political benefit. It is further stated on behalf of Respondent No.1 that the construction work of Anganawadi is done on previously constructed Crematorium (Mhasan vata). Thus the construction done by Respondent No.1 is on the same foundation of previously constructed Crematorium (Mhasan vata) which is situated on Gat no.15 of village Shirki taluka Pen. If the 7/12 Extract of the said Gat no.15 of village Shirki taluka Pen is perused it is crystal clear that the said Gat no is in the name of Respondent No.1 as it is written Group Grampanchayat Shirki. Thus, the said land is owned by Respondent No.1 Moreover than that in the other right column (इतर अधिकार) there is no mention of CRZ at all. Thus, the contention of the Applicant that the 7/12 Extract of the said survey number clearly shows that no construction in any form is permitted in the said CRZ Area doesn't hold good and the said statement is altogether misleading and false. It is, pertinent, to note that the Respondent No.1 with the seal and signature of Gram Sevak and the Sarpanch had tendered a written complaint to the respected sub divisional officer (SDO), Pen dated 05/05/2022 against the said Applicant for creating obstruction in the constructive work which is done by Respondent No.1 for the benefit and convenience of the Villagers.

4. The Respondent No.1 states that the contentions of Para No. 3 (V) are false, concocted and misleading in Toto. The construction work is been carried in Survey No.15 which comes under the Gram Panchayat Jurisdiction of Respondent No.1. It is further stated that prior of starting the construction work on the said place there was a Crematorium (Mhasan vata) for people of Hindu religion. The said construction was very old one and Assessment Extract No. 8 which is filed at Serial No.6 of the list of documents bearing no.302 C issued by the then Gram Panchayat Shirki in 1994. Moreover than that The 7/12 Extract of Gat No.15 Village Shirki is perused in the other right column the existence of Masan Vata is reflected clearly Thus, it is crystal clear that there was old construction at the said spot in survey No.15 hence it comes under the proviso of the said section. The Respondent No.1 vide its resolution no. 175 dated 11/01/2022 passed its resolution in monthly meeting has unanimously decided to



construct a Anganwadi on the said outdated and not in use at the relevant time Crematorium (Mhasan Vata).The same is filed at serial no.4 of the list of documents as submitted along with the said say. Moreover, then that a supporting resolution is also unanimously passed vide its resolution no. 23 dated. 25/02/2022 by the Gram Sabha of Respondent No.1. If the said resolution is perused it is expressed that an alternative Crematorium (Mhasan Vata) is being made on other premises hence this old Crematorium (Mhasan Vata) is not in use in recent past therefore it is decided that as there is no other place in the Gaavthan land hence the said Anganwadi is to be constructed on the same place by demolishing the old Crematorium (Mhasan Vata). Accordingly, as per the said two resolutions the construction work for the said Anganwadi is being done on the same spot where there was previously Crematorium (Mhasan Vata) which is in Survey no.15 which comes under Respondent No.1. It is pertinent to note that as the new construction is done on exactly the same spot where the very old Mhasan Vata was situated hence no question arises of cutting any sort of Mangroves or any other Trees as there was naturally no any plant on the said old cement construction obviously because no mangroves can grow on a cement or a concrete place. The construction work of the said Anganwadi is already completed.

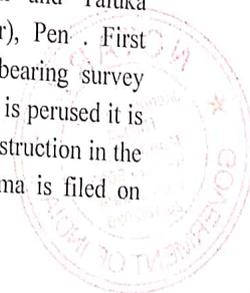
5. The contents of Para No. 3 (VI) and (VII) of the said application are incorporated with ill intention to deceive and mislead the Hon'ble Court. The Respondent No.1 has now and then categorically mentioned that the construction work is being done in Gat No.15 Village Shirki. The funds which are sanctioned for government projects which in this case is Anganwadi developed in Survey no.15, by the office of Panchayat Samiti, Pen which is utilized for the development which is done in land which is within the territorial limits of Respondent No. 1. That itself shows that the construction work is done as per legal provisions of law. It is pertinent to note that the office of Panchayat Samiti , Pen has never objected to disburse the sanctioned amount pertaining to the construction work of the newly constructed Anganwadi that itself shows that the work is properly carried over by Respondent No.1 within the survey number 15 as per expected guidelines , which is in the territory of Respondent No.1. It is further contented that after the construction of the said Anganwadi as per the norms the Respondent No.1 has issued a fresh assessment extract bearing no. 603 and 604 the same is annexed at serial no.7 of the list of documents. If the extracts 7/12 of survey no.15 which is within vicinity of Respondent No.1 is seen there is no remark of CRZ on the said extract hence the sanction of Respondent No.9 prior to starting of redevelopment construction doesn't arise as per legal provisions. It is pertinent to note that admittedly prior to construction of Anganwadi there was Crematorium (Mhasan vata) as reflected on extract of Gat no.15 Village Shirki and as per assessment extract



which is filled on behalf of Respondent No. 1. No permission of what so ever nature is obtained by the than Group Grampanchayat Shirki that itself shows that no permission is required to be obtained from Respondent no. 9 MCZMA. It can be noted that as permission was not obtained at that particular time hence the Respondents no.1 did not applied for seeking permission from Respondent no. 9 MCZMA as per legal provisions of law. Hence, considering the above facts and circumstances it is crystal clear that no question of environmental destructive activities is carried by and on behalf of Respondent No.1 and hence there is no requirement of indulgence at the hands of this Hon'ble Court. It is pertinent to note that in prayer clause of the application nowhere relief is prayed regarding permission not being obtained by Respondent no. 1 from Respondent no. 9 MCZMA.

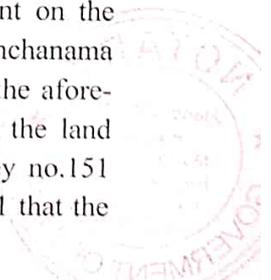
6. Respondent No.1 state that whatever is stated in said Para no.4 the said Respondent is unaware as to what the applicant has stated about himself. Hence the Respondent No.1 does not wish to comment on the same. However, the Respondent No.1 painfully submits that the applicant has for no reason of whatsoever and with ill intention to trouble the Respondent No.1 and in hand and glove with the adjacent owner of survey no.15 Mr. Ramakant Govind Patil owner of survey no.14 has filed this present false application and unnecessarily dragged Respondent No.1 and other important government departments in the said matter as constructive and social work is being carried out by Respondent No.1 for the benefit of its villagers at large with the aid of other respondents however to trouble all the government departments and government officials/ Machinery the applicant has unnecessarily filed the present application against them.

7. The contents of Para No.5 are denied by the Respondent No.1 in Toto. The contents there in are baseless and are mentioned with vengeance the applicant be asked to strictly prove the same say. It is categorically stated on behalf of Respondent No.1 that no any activities of destruction are being carried out in the said no any activities of destruction are being carried out in Gat no.15 . That itself proves that whatever work is sanctioned is being carried out keeping in mind all the norms is being carried out in Survey No.15 which are within the territorial limits of Respondent no.1. It is further contented that as per the orders passed by the Hon'ble Court to ascertain the said allegations made by the applicant in the said application two distinct Panchanamas are conducted by the Respondent No.3, the Respondent No.6, the Respondent No.8 and Assistant Police sub- Inspector, Vadkal Police station and Mandal Adhikari, Pen and Taluka Nirakshak Bhumi Abhilekh (Land Surveyor Officer), Pen . First Panchanama is conducted on 08/06/2022 for land bearing survey no.15 situated in village Shirki if the said Panchanama is perused it is clearly mentioned that no any tree is being cut and construction in the form of Anganwadi is observed. The said Panchanama is filed on



behalf of Respondent No.1 at serial no.09 of list of documents annexed along with the said say. The second Panchanama is conducted for land bearing survey no.152 situated in village Bori (Respondent No.2) dated. 08/06/2022 if the said Panchanama is perused it is clearly mentioned that no trees are being cut nor there is any damage of mangroves. It is pertinent to note that there is no mention of any sort of construction in the said Panchanama. The said Panchanama is filed on behalf of Respondent No.1 at serial no.08 of list of documents annexed along with the said say. Hence, it is proved that the applicant had either not visited the said spot or the applicant is totally misleading the Hon'ble Court and at the same time dragging all the important government departments in the said matter it can be appreciated that all the said departments has to divert their time regarding the said matter when they are expected to devote their time for the constructive work for the benefit of the citizens. It is pertinent to note that the applicant has deleted Line No.5 of Para no.5 which is as "7/12 extract of the said survey number clearly shows that no construction in any form is permitted in the said CRZ area. The said plot of land is Government Land", without the permission of the Hon'ble Tribunal as amendment was not sought for deletion of the said line .

8. The contents of Para No.6 of the said application are misconstrued and misleading. The applicant be strictly asked to prove the same. As stated above the construction of Anganwadi which is done on the spot of previously constructed Crematorium (Mhasan vata) which is in Survey No.15 in the limits of Respondent no.1, if the said 7/12 extract is perused no remark of CRZ is seen. The applicant has wrongly sent a complaint via Whatsapp to the Revenue and Forest Authorities in the District and even made a complaint to the MCZMA on 07/05/2022 via email. The said complaints are all together false and misleading which is proved by the Panchanama dated 08/06/2022 which do not corroborate the contentions of the applicant. As stated above the said Panchanama is conducted in the presence of the Respondent No.3, the Respondent No.6, the Respondent No.8 and Assistant Police sub Inspector, Vadkal Police station and Mandal Adhikari (Circle Officer) , Pen and Taluka Nirakshak Bhumi Abhilekh, Pen. However, the attached photographs at Annexure A/2 are not of Gat No.15. The applicant be asked to prove the same.
9. The Respondent No.1 submits that whatever averments are made in Para No.7 is not within the knowledge and information of Respondent no.1 hence the Respondent No.1 do not desire to comment on the same. Further it is stated that as per the remark in the panchanama made by the forest department Vadkhal dated 05.05.2022, the aforementioned gat no.15 is in village Shirki. However, as per the land records alleged area is a part of survey no.150 and survey no.151 however it is humbly submitted on behalf of respondent no.1 that the



said Anganwadi is in distinct gat no.15. Moreover than that as per observation of joint committee also the said Anganwadi doesn't come in survey no. 152, where allegedly as per the complainant in main application the Anganwadi is situated. Admittedly construction of Anganwadi is in gat no.15 which is situated in Grampanchayat Shirki that is Respondent No.1. It is, further stated that prior of starting the construction work on the said place there was a Crematorium (Mhasan vata) for people of Hindu religion. The said construction was very old one and Assessment Extract No. 8, which is filed at Serial No.6 of the list of documents bearing no. 302 C issued by the then Gram Panchayat Shirki in the year 1994. Thus, it is crystal clear, that there was old construction at the said spot in survey No.15. It is pertinent to note that as the new construction is done on exactly the same spot and foundation where the very old Mhasan Vata was situated. Hence, no question arises of cutting any sort of Mangroves or any other trees as there was naturally no any plant on the said old cement construction obviously, because no mangroves or any other tree can grow on cement or a concrete place. Hence, it is apparently seen that no any mangrove trees were cut as same foundation is utilized where previously a Crematorium (Mhasan vata) was in existence.

10. The contents of Para No.8 are false, frivolous and concocted hence the Respondent No.1 does not admit the same. The Respondent No. 1 states that whatever Panchnama is conducted regarding the disputed site as mentioned by the applicant it is admittedly mentioned that in the said Panchnama no mangroves existing and no mangroves cutting has been done at the disputed site that itself shows that all the mangroves within the territory are intact and there is no damage to the mangroves and environment at large. It is pertinent to note that Respondent No.1 is a government entity and a very responsible body. The Applicant has commented on the contents of the Panchnama that it is shocking to know that the said panchnama states that there are no mangroves existing and no mangroves cutting has been done at the disputed site. It is pertinent to note that if the applicant has opined about the contents of the panchnama then how come he has stated in the application of amendment that he was not aware regarding the exact survey number and has wrongly written survey no.152 however he has come to know the exact Gat number after going through the joint committee report. It can be noted that the said panchnama dated 5.05.2022 it is clearly mentioned that regarding the said area village shirki people say that mention in application Mr.Kashinath Jagannath Thakur is Konkani Education Society, High School Shirki and the area adjacent to East direction Gat No.152 not the area of 152 but that area are Gat no.15.

11. The contents of Para No.9 are not admitted on behalf of the Respondent No.1 the contents in the said paragraph are wrongly composed and afterthought. The applicant has not annexed any



Panchanama along with the said application which is referred in the said Para No.9 no date is mentioned of the said Panchanama. However the applicant states that the villagers who were present had observed that a bogus Panchanama is being prepared claiming that there are no mangroves existing at Survey No.152 and there has been no mangroves cutting. It is pertinent to note that the applicant has made a very vague and irresponsible statement as no name of any villager is mentioned and without the Panchanama on record a statement is made just on the observation of some villagers without naming them, that itself shows the applicant has filed the present application with vengeance and bias attitude. The further contention that the applicant had sent complaints to the Chief Ministers Office, the Governor's Office and the Respondent Government Authorities is not annexed of any copy of the same along with the application however the contention of the applicant that he has urged that the destroyed mangrove area should be restored, the construction completed should be removed and thorough enquiry and investigation should be done of the defaulting forest department officers and criminal cases be filed against them. The said allegations does not hold any base and hence the applicant be asked to prove the same. As stated above the applicant with personal vengeance and political rivalry has made such baseless and bogus allegations.

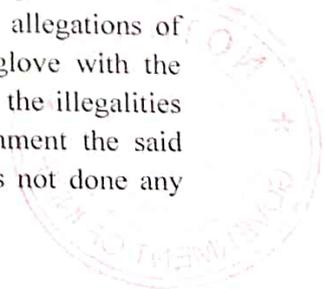
12. The contents of Para No.10 are false and misleading. The construction work is carried by Respondent No.1 in the land within the territory bearing Gat no.15. The 7/12 extract of the said Gat no.15 has no remark of CRZ Land and therefore the contention of the applicant that it is no development zone is wrong and misleading in Toto. It is further stated on behalf of Respondent No.1 that the construction work of Anganawadi is done on previously constructed Crematorium (Mhasan vata). Thus the construction done by Respondent No.1 is on the same foundation of previously constructed Crematorium (Mhasan vata) which is situated on Gat no.15 of village Shirki taluka Pen. If the 7/12 Extract of the said Gat no.15 of village Shirki taluka Pen is perused it is crystal clear that the said Gat no is in the name of Respondent No.1 as it is written Group Grampanchayat Shirki. Thus, the said land is owned by Respondent No.1 Moreover than that in the other right column (इतर अधिकार) there is no mention of CRZ at all. Thus, the contention of the Applicant that the 7/12 Extract of the said survey number clearly shows that no construction in any form is permitted in the said CRZ Area doesn't hold good and the said statement is altogether misleading and false. The construction is carried out in survey no.15 where there was previously a Crematorium (Mhasan vata) and the same does not come under CRZ area. Hence, as there was no substance in making complaints to all the respondent authorities hence no action was taken for stopping the ongoing construction work which was undertaken by respondent no.1.



Moreover than that as no destruction of Mangroves was done and as Gat no.15 does not come under the category of CRZ-1 Area hence rightly no offences have been filed against the Gram Panchayat Office bearers.

13.The Respondent submits that the contents of Para No.11 are false and redundant. The Respondent No.1 Gram Panchayat Shirki has carried out construction in survey no.15 where there was previously a Crematorium (Mhasan vata) and the same does not come under CRZ area. A bare perusal of the 7/12 extract of survey no.15 will show that it does not come under the purview of CRZ. Moreover, then that the construction work of Anganwadi is carried on the place where there was previously a Crematorium (Mhasan vata). Hence, no additional area is occupied for the construction of the said Anganwadi. Thus, the question of obtaining CRZ clearance from the Respondent No.8 MCZMA does not arise and no any sort of illegal act is done on part of Respondent No.1. Thus, the contention of applicant that the Anganwadi project needs to be scrapped is unwarranted and it will affect the educational facility of the children in the village and vicinity.

14.The Respondent submits that the contents of Para No.12 of the said application are false in Toto and not admitted by the Respondent No.1. The allegations made are to be proved by the applicant as stated above now and then no mangroves are cut or damaged. Thus, no question of degraded mangroves to be restored to its original state. The Respondent No.1 is a responsible government authority and there is not a single chance that they will indulge in such an activity. Hence, the prediction of the applicant that there are high chances of high flooding in the area there by causing destruction of agricultural fields in the village there by rending the fertile lands infertile permanently. The said fear of the applicant is unwarranted as there is no damage done to mangroves or any construction is carried in CRZ area. The Respondent No.1 is an well-known efficient and affective Gram Panchayat and are devoted for the welfare of its villagers. The construction of the project Anganwadi is one of the projects which are planned for the welfare of the children of the villagers. The said Anganwadi project is being completed keeping in mind all norms, rules and regulations. Thus, there cannot be any man made calamity and Respondent No.1 is very capable to protect the villagers and to protect the environment and its various components so as to provide healthy life to the villagers. The Respondent No.1 is duty bound to do all the acts which are required to protect the villagers and the environment and its various components. The further allegations of the applicant that the Respondent No.1 is hand in glove with the Revenue and Forest authorities and is trying to shield the illegalities and is directly contributing in destruction of environment the said allegation is uncalled for as the Respondent No.1 has not done any



illegal act and has constructed the Anganwadi in survey no.15 which is in their territory and does not come under the CRZ area. The said construction is done where there was previously Crematorium (Mhasan vata). As all the prerequisite conditions, rules and regulations and norms are followed by Respondent No.1 all the other respondents and different government departments has not objected or obstructed the good work done by Respondent No. So there is no question of Respondent No.1 to go hand in glove with other departments.

15. The contention in Para No.13 of the said application is opposed on behalf of Respondent No.1 in Toto. As stated above the Anganwadi project is completed with all the prerequisite conditions, rules and regulations and norms which are followed by Respondent No.1. So the question does not arise that the marine environment is going to be adversely affected on a large scale and the said degraded environment couldn't be in a condition to be restored by any means. The said contention is totally opposed as the Respondent No.1 has taken utmost care and precaution and followed each and every rule and regulations and thereafter acted upon and completed the Anganwadi project. If stay order is granted an irreparable loss will be caused to Respondent No.1 on a large scale as the said project is for the welfare of the villagers and the said project is legally constructed.

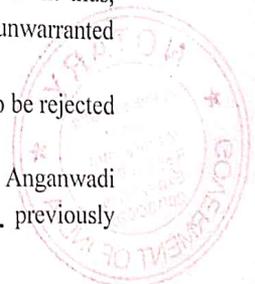
16. The contention of Para No.14 is strongly opposed by Respondent No.1. The said Respondent No.1 has acted upon and constructed the said Anganwadi with following legal rules and regulations and hence has taken support of other departments legally no act of any illegality is done by Respondent No.1. So, the contentions of the applicant in the said paragraph are unwarranted and uncalled for.

17. No cause of action has arisen to file this particular application has Respondent Shirki Gram Panchayat has not harmed, damaged or cut any of mangroves or any other tree as stated repeatedly above that the construction work is done in survey no.15 within the territory of Respondent No.1 and the place where there was previously Crematorium (Mhasan vata). No act of illegality is done by Respondent No.1 thus the application is altogether redundant hence the question of filing the same within limitation does not hold any merit.

18. The Respondent No.1 states that no mangroves or any other tree is subject to destruction because of the act of Respondent No.1 thus, the application does not rises substantial question of environment thus, the present application filed before the Hon'ble Court is unwarranted

for.
19. The Prayer Clause as enumerated in Para No.19 requires to be rejected as on the face of it, it does not hold any merit.

20. The Prayer Clause 19 (b) may not be allowed as the Anganwadi project is constructed on the place where there was, previously



Crematorium (Mhasan vata) on the land within the territory of Respondent No.1 village Shirki bearing survey no.15. Respondent No.1 has not done any act of illegality thus, stay may not be granted. The construction work of the said Anganwadi is already completed and the said school for kids as already started.

21. The Prayer Clause 19 (c) may not be granted as not a single tree is being damaged, cut or destroyed. The Anganwadi is being constructed following all the legalities on the land of previous not in use Crematorium (Mhasan vata). The said land does not come under CRZ-1.
22. The Prayer Clause 19 (d) may not be granted as the Anganwadi project is completed after following all the rules and regulations and norms. Moreover, the said land does not come under CRZ-1.
23. The Prayer Clause 19 (e) is and the contentions there in are unwarranted for as no any illegal act is being done on behalf of Respondent No.1. The joint committee has already filed its Report. Thus, the prayer is redundant one and may not be granted.
24. To the prayer clause 19 (f) to (i) doesn't hold any merit on the above given facts and circumstances and taking legal aspect into consideration.

Thus considering the above submission's, legal provisions of laws and documents filed on behalf of Respondent No.1 it is prayed to the Hon'ble Court that

- i.) That the Hon'ble court be pleased to pass an order so as to dismiss the said application
- ii.) Any other order in the facts and circumstances of the case may be passed in favour of the Respondent No.1
- iii.) Cost of the said application be granted to Respondent No.1, it being a government authority
- iv.) The Respondent No.1 be allowed to amend the say and file relevant documents, if necessary.

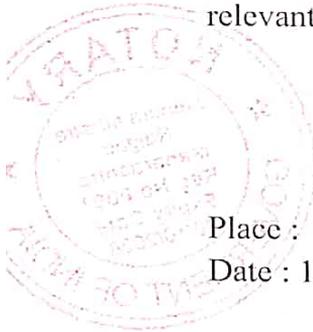
Humbly submitted,

J.P.

Respondent No.1
समपचायत, शिर्की

Place : PUNE

Date : 19/01/2023



VERIFICATION

I, Mrs. Supriya Jaywant Patil, age : Occ. Gram Sevika do hereby confirm and verify the contents of the above Say to be true and correct to the best of my knowledge, information and belief and I affirm it to be true for which I have signed hereunder on 19th of January, 2023 at PEN.

Place : PUNE
Date : 19/01/2023

File
मामसवक
Respondent No. 1
मामपचायत.शिके

Patil
Adv. Dinesh J. Patil

BEFORE ME

Jitendra
Adv. Jitendra D. Mhatre
B.A. LL.M
NOTARY Govt. of India
Shrinivas, Plot No. 159.
MHADA Colony, At.-Pen
Raigad - (M.S.)

Serial No. 182
No. of Pages:- 12
Date :- 19/01/2023

Signatory Identified From
ID.Proof-Adhar/Pan/DL/E.C/-
NO- 2452 2603 2932

Jitendra

