

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
AT NEW DELHI**

OA No. 662 of 2025

PUDA Enclave Welfare Society

....Applicant

Versus

State of Punjab & Ors

....Respondents

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**NDOH:18.05.2026**

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*Karun*

KARUN BANSAL

BHAVIKA BANSAL

GURPREET SINGH

PH/5355/2019

PH/3467/2020

PH/3888/2020

NoR:222599

ADVOCATES

COUNSELS FOR RESPONDENTS NO. 6, 7 & 8

Date: 16.03.2026

Place: New Delhi

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
AT NEW DELHI**

OA No. 662 of 2025

*In the matter of:*

PUDA Enclave Welfare Society

....Petitioner

Versus

State of Punjab & Ors.

....Respondents

**SHORT REPLY IN THE FORM OF  
AFFIDAVIT of Radhey Shyam Goyal s/o Sh.  
Ruldu Ram Goyal aged about 64 years  
resident of 192 Punjabi Bagh, Patiala  
(AADHAR NO.: 5682-9726-9079) in his  
capacity as Director of company RSG  
Properties Pvt Ltd., only on behalf of  
Respondents No. 6, 7 and 8.**



**RESPECTFULLY SHEWETH:**

1. That the present Original Application has been filed by the Applicant Society making certain frivolous allegations with regard to alleged construction activities and environmental violations at Commercial Site No. 1, PUDA Enclave-1, Near Mini Secretariat, Patiala.

RSG Properties Pvt. Ltd.

*[Signature]*  
Director

*verified that the Doc. WS.PAP  
P.A. has been read over & explained  
in Simple Language to the deponent  
deponent ..... who seemed  
to be perfectly fit to understand the  
same at the time making thereof*

2. That at the very outset it is respectfully submitted that RSG Properties Private Limited has absolutely no concern, connection, ownership, possession, development rights, management control or operational involvement whatsoever with the property or project referred to in the present application.
3. That the Directors of RSG Properties Private Limited have been impleaded only in their capacity as Directors of the company, and it is respectfully submitted that the said Directors have no personal involvement or connection with the property or project referred to in the application.
4. That the answering respondents submit that the said property is neither owned developed by RSG Properties Private Limited, nor has the company undertaken any construction or development activity at the said site.
5. That it is further submitted that no approval, licence, consent, environmental clearance, building plan approval, or any statutory permission in relation to the said property or project has ever been applied for or obtained by RSG Properties Private Limited.
6. That the answering respondents submit that the project referred to in the present Original Application pertains to a different project proponent and has no relation whatsoever with RSG Properties Private Limited.



RSG Properties Pvt. Ltd.

Director

certified that the Doc. has been read over & explained in Simple Language to the deponent who seemed to be perfectly fit to understand the same at the time making the

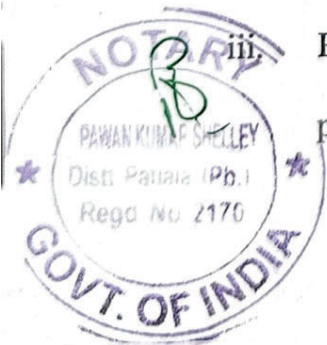
7. That the answering respondents have been wrongly and unnecessarily impleaded in the present proceedings without any factual foundation, and therefore no cause of action arises against RSG Properties Private Limited or its Directors.
8. That the answering respondents respectfully submit that their presence in the present proceedings is neither necessary nor proper for adjudication of the issues raised in the present application.
9. That the answering respondents reserve their right to place on record additional documents and submissions, if required during the course of the proceedings.

**PRAYER CLAUSE:**

In view of the facts and submissions stated above, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- i. Record that RSG Properties Private Limited and its Directors have no connection or involvement with the property or project referred to in the present Original Application;
- ii. Delete / discharge RSG Properties Private Limited and its Directors from the array of parties in the present proceedings;

iii. Pass any other order which this Hon'ble Tribunal may deem fit and proper in the interest of justice.



*Verified that the Document is PAI  
 & PA has been read over & explained  
 in Simple Language to the deponent  
 who seemed  
 to be fully fit to understand the  
 contents of the said Document.*

RSG Properties Pvt. Ltd

*[Signature]*  
 Director

Date: 16/3/26  
Place: Patiala

RSG Properties Pvt. Ltd

 Director

Radhey Shyam Goyal  
Director  
RSG Properties Pvt. Ltd.  
Respondent No. 7

And on behalf of Respondent No. 6 & 8.

VERIFICATION:

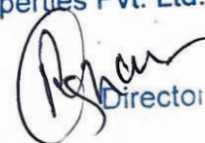
It is to verify that the contents of the abovesaid affidavit are true to the best of knowledge and belief and no part of the information is false and nothing material has been concealed therein.

Date: 16/3/26

Place: Patiala

verified that the Document is a true copy of the original. The PA has been read over & explained in Simple Language to the deponent's executant.....who seemed to be perfectly fit to understand the same at the time making there of

RSG Properties Pvt. Ltd.

 Director

Radhey Shyam Goyal  
Director  
RSG Properties Pvt. Ltd.  
Respondent No. 7

And on behalf of Respondent No. 6 & 8.



Karun

THROUGH COUNSEL

Attested As Identified  
  
NOTARY PUBLIC  
PATIALA INDIA  
16 MAR 2026

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KARUN BANSAL  
PH/5355/2019

