

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

O.A. No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

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FILED THROUGH:







[SIDDHARTH BATRA], [ARCHANA YADAV] [SHIVANI CHAWLA]





[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 109- M/s Chandni Industries Pvt. Ltd.
8A, Sagar Apartments, 6-Tilak Marg,
New Delhi-110001.
Mob.: 9888884445

Date: 03.05.2025
Place: New Delhi

E-mail: siddharth.batra@satramdass.com
Phone: 011 4704 6111

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**SHORT REPLY ON BEHALF OF THE RESPONDENT NO.
109- M/s CHANDNI INDUSTRIES PVT. LTD.**

MOST RESPECTFULLY SHOWETH:

1. That the present Reply is being filed on behalf of Respondent No. 109- M/s Chandni Industries Pvt. Ltd. in the above-captioned original application pending before this Hon'ble Tribunal. At the very outset, it is most respectfully submitted that the filing of this Reply shall not, in any manner, be construed as acquiescence by the answering respondents to their impleadment in the present proceedings. On the contrary, this Reply is being submitted to demonstrate that no cause of action exists against the answering respondents and, therefore, they ought to be discharged from the present case as improperly impleaded parties.
2. That the present reply is being submitted on behalf of the industries that have been impleaded as Respondents in the above-captioned matter despite being fully compliant with the environmental laws, regulations, and standards as prescribed under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981.

3. That the Joint Committee Report annexed as Annexure 4 categorically marks the above industries as 'Compliant', indicating full adherence to environmental norms, proper operation of their respective Primary Effluent Treatment Plants (PETPs), and non-involvement in any unauthorized discharge or groundwater extraction violations.
4. That the impleadment of compliant industries in the present matter is arbitrary, as there exists **no cause of action** against them. The Hon'ble Supreme Court and various High Courts have repeatedly held that a party that has not committed any wrong ought not to be unnecessarily impleaded in a proceeding, as it leads to an unwarranted burden on the judicial system and prejudices the rights of the parties involved.
5. That the National Green Tribunal is governed by the provisions of the Code of Civil Procedure (CPC). Order VII Rule 11 of the CPC explicitly states that a suit or plaint may be rejected if it fails to disclose a cause of action against a specific defendant. In the present case, there is no specific cause of action against the compliant industries, and their impleadment in these proceedings is without basis.
6. That the Hon'ble Tribunal's Order dated 08.01.2025 makes general observations regarding environmental issues in the Barhi Industrial Area; however, these observations do not apply to the compliant industries. Thus, including these industries as parties in the present proceedings is not justified and would lead to unnecessary litigation burdens.

7. That the Respondents reiterate their commitment to environmental protection and have consistently undertaken all required measures to ensure compliance with statutory requirements. These include regular monitoring, submission of compliance reports to the Haryana State Pollution Control Board (HSPCB), and investment in sustainable industrial practices.
8. That in light of the above, it is humbly submitted that the present compliant industries may be delisted from the present proceedings, as they have not violated any statutory provisions, and their continued impleadment in this matter would only serve to unduly burden the Hon'ble Tribunal.

PRAYER

In light of the foregoing submissions, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

- A. Delete the names of the answering respondents from the present proceedings, as their impleadment is arbitrary and without cause;
- B. Pass any other order(s) as may be deemed fit and proper in the interest of justice.



[SIDDHARTH BATRA], [ARCHNA YADAV] [SHIVANI CHAWLA]



[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 109- M/s Chandni Industries Pvt. Ltd.
8A, Sagar Apartments, 6-Tilak Marg,
New Delhi-110001.
Mob.: 9888884445

Date: 03.05.2025
Place: New Delhi

E-mail: siddharth.batra@satramdass.com
Phone: 011 4704 6111

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Versus

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...Respondents

AFFIDAVIT

I, Vipul Jain S/o Sh. Chander Prakash Jain aged about 51years R/o 152 Anand Vihar, Pitampura, Anand Vihar Pitampura, North West Delhi-110034 do hereby solemnly affirm and stat as under:

1. That I am the authorized signatory of Respondent No. 109, M/s Chandni Industries Pvt. Ltd, having its office at Plot no.503, Phase-II, Barhi Industrial Area, Sonipat, in the aforesaid Original Application, I am aware of the facts and circumstances of the case in my official capacity as stated above and hence, entitled to swear this affidavit.
2. That the accompanying reply has been drafted by my counsel under my instructions, and I say that the statements and submissions made in the said reply are true and correct to best of my knowledge based upon the records and my belief. I pray that the said reply to be treated as part and parcel of this Affidavit and the same is not being reproduced for the sake of brevity.
3. I say that the documents / annexure produced along with the reply are true copies of its originals.

For Chandni Industries Pvt. Ltd.

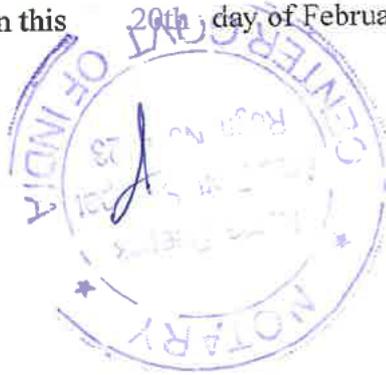
DEPONENT

Director

VERIFICATION:

Verified that the contents of the above affidavit are true and correct to the best of my knowledge, belief and nothing material information has been concealed therefrom. No part of it is false.

Verified at Sonipat on this 20th day of February, 2025.



For Chandni Industries Pvt. Ltd.
DEPONENT

[Signature]
Director

ATTESTED
[Signature]
NOTARY
Sonipat
20/2/25

VAKALATNAMA**BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH, NEW DELHI****ORIGINAL APPLICATION NO. 622 OF 2024****IN RE: -****VARUN GULATI****...APPLICANT****VERSUS****STATE OF HARYANA & ORS****...RESPONDENTS**

KNOW ALL to whom these presents shall come that I/We, undersigned the above name do hereby appoint.

SIDDHARTH BATRA (P/1083/2004), ARCHNA YADAV (D/1837/2020), SHIVANI CHAWLA (D/2233/2019), CHINMAY DUBEY (D/8141/2021) & RHYTHM KATYAL (D/3528/2022);

Advocates

Satram Dass B & Co., BA, Sagar Apartment, 6 Tilak Marg, New Delhi-110001 Mob: 988888 4445, Email: siddharthn.batra@satramdass.com

(hereinafter called the advocate/s) to be my/our Advocate in the above noted case and authorize him: -

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and in the Appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign file, verify and present pleadings, appeals, cross-objections or petitions for executions, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage. To file and take back documents, to admit and/or deny the documents of the opposite party. To withdraw or compromise the sale case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for progress and during the prosecution of the said case. To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think it fit to do so and to sign the power of attorney on our behalf. And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes. And I/We undertake that I/We or my/our duly authorized agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself. And I/We the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this **3rd** day of **May** 2025

Accepted, identified and certified subjected to the terms of the fees.

CHANDNI INDUSTRIES PVT. LTD.
PLOT NO. 503, PHASE-II, EARHI
INDUSTRIAL AREA - SONEPAT
HARYANA-131101

[SIDDHARTH BATRA] [ARCHNA YADAV]

[SHIVANI CHAWLA] [CHINMAY DUBEY] & [RHYTHM KATYAL]

Client

Advocates

For Chandni Industries Pvt. Ltd.

Director



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ॐ श्री गणेशाय नमः ॐ

CHANDNI INDUSTRIES PVT. LTD.

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CIN : U21000DL2013PTC254602

Manufacturer of : **Club Quality Playing Cards**

UNIT-II : Plot No. 503, Phase-II, Barhi Industrial Area, Sonapat (Haryana)

Head Office : 2445/119 Teliwara Sadar Bazar, Delhi-110006

Board Resolution:

Certified copy of resolution passed in the meeting of board of Directors of M/s Chandni Certified Industries Private Limited. Held on 20.02.2025 at 11:00 am at its registered office of the company.

*The Director Mr. Vipul Jain S/o Sh. Chander Parkash Jain is authorised to sign, verify, and submit all necessary documents and affidavits related to **Inspection report filed by HSPCB.***

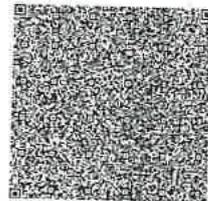
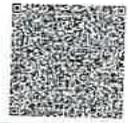
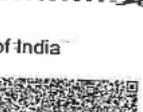
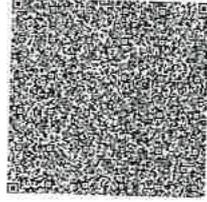
RESOLVED FURTHER THAT all actions taken by Mr. Vipul Jain in connection with the above matters be and are hereby ratified and confirmed .

For Chandni Industries Pvt. Ltd.


Director

For Chandni Industries Pvt. Ltd.


Director

  <p>भारतीय विशिष्ट पहचान प्राधिकरण भारत सरकार Unique Identification Authority of India Government of India</p> <p>नामांकन क्रम/ Enrolment No.: 0000/00512/15201</p> <p>To विपुल जैन VIPUL JAIN S/O Cp Jain 152 Anand Vihar Pitampura Anand Vihar Pitampura Saraswati Vihar North West Delhi Delhi - 110034 9811166509</p> <p>Download Date: 07/07/2018 Generation Date: 04/06/2018</p> <p>Validity: unknown</p>  <p>QR Code with Photograph</p> <p>आपका आधार क्रमांक / Your Aadhaar No. : [REDACTED] 6871 VID : 9171 1367 8456 4485</p> <p>मेरा आधार, मेरी पहचान</p>	  <p>सूचना</p> <ul style="list-style-type: none"> ■ आधार पहचान का प्रमाण है, नागरिकता का नहीं। ■ पहचान का प्रमाण ऑनलाइन ऑथेंटिकेशन द्वारा प्राप्त करें। ■ यह एक इलेक्ट्रॉनिक प्रक्रिया द्वारा बना हुआ पत्र है। <p>INFORMATION</p> <ul style="list-style-type: none"> ■ Aadhaar is a proof of identity, not of citizenship. ■ To establish identity, authenticate online. ■ This is electronically generated letter. <div style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> ■ आधार देश भर में मान्य है। ■ आधार भविष्य में सरकारी और गैर-सरकारी सेवाओं का लाभ उठाने में उपयोगी होगा। ■ Aadhaar is valid throughout the country. ■ Aadhaar will be helpful in availing Government and Non-Government services in future. </div>
  <p>भारत सरकार Government of India</p>  <p>विपुल जैन VIPUL JAIN जन्म तिथि/DOB: 22/08/1973 पुरुष/ MALE</p>  <p>[REDACTED] 6871 VID : 9171 1367 8456 4485</p> <p>मेरा आधार, मेरी पहचान</p>	  <p>भारतीय विशिष्ट पहचान प्राधिकरण Unique Identification Authority of India</p> <p>पता: सी पी जैन, 152, आनंद विहार, पीतम्पुरा, आनंद विहार, पीतम्पुरा, उत्तर पश्चिमी, दिल्ली - 110034</p> <p>Address: S/O Cp Jain, 152, Anand Vihar, Pitampura, Anand Vihar, Pitampura, North West Delhi, Delhi - 110034</p>  <p>[REDACTED] 6871 VID : 9171 1367 8456 4485</p>

Vipul Jain



Vijay Kumar <vijay.kumar@satramdass.com>

Advance service copies of short reply on behalf of Respondent Nos. 12, 36, 78, 80, 81, 82, 86, 91, 109, 110, 112 & 115 - M/s Vibrant Yarns in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

1 message

Vijay Kumar <vijay.kumar@satramdass.com>

Sat, May 3, 2025 at 2:53 PM

To: Mansi Chahal <mansichahal104@gmail.com>, Varun Gulati <jansewajanhit@gmail.com>

Cc: Chinmay Dubey <chinmay.dubey@satramdass.com>, Shivani Chawla <shivani.chawla@satramdass.com>, Archana Yadav <archana.yadav@satramdass.com>, Rhythm Katyal <rhythm.katyal@satramdass.com>, Parth Poonia <Pooniiparth2000@gmail.com>

Dear Sir,

PFA.

Advance service copies of short reply on behalf of Respondent Nos. 12, 36, 78, 80, 81, 82, 86, 91, 109, 110, 112 & 115 - M/s Vibrant Yarns in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

Kindly treat the same as Proof of service.

Regards

Vijay Kumar
Office Manager

8A Sagar Apartment
6 Tilak Marg
New Delhi - 110001
Landline - +91-11-47046111
vijay.kumar@satramdass.com

Satram Dass B & Co. made the following annotations

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