

**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. 96- M/s Raja Industries

8A, Sagar Apartments, 6-Tilak Marg,

New Delhi-110001.

Mob.: 9888884445

Date: 20.05.2025

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Place: New Delhi

Phone: 011 4704 6111

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**SHORT REPLY ON BEHALF OF THE RESPONDENT NO. 96-
M/S RAJA INDUSTRIES**

MOST RESPECTFULLY SHOWETH:

1. That the present Reply is being filed on behalf of Respondent No. 96-M/s Raja Industries 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. 96- M/s Raja Industries
8A, Sagar Apartments, 6-Tilak Marg,
New Delhi-110001.
Mob.: 9888884445

Date: 20.05.2025
Place: New Delhi

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

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O.A. No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

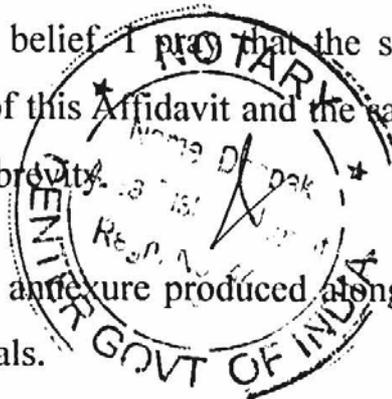
State of Haryana & Ors.

...Respondents

AFFIDAVIT

I, Sahil Bhatia S/o Sanjay Bhatia, aged about 29 years R/o A-11, Suvidha Appt., Sector-13, Rohini, Delhi-110085, do hereby solemnly affirm and stat as under:

1. That I am the authorized signatory of Respondent No. 96, M/s Raja Industries, having its office at Plot no-298, Phase-1, HSIIDC, Barhi Ind's Area, Sonipat, Haryana, 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 / ~~and~~ ^{signature} produced along with the reply are true copies of its originals.



For RAJA INDUSTRIES
[Signature]
 DEPONENT Prop.

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 Gannaur on this 13th day of May, 2025



For RAJA INDUSTRIES
[Signature]
 Prop.
 DEPONENT

ATTEST

[Signature]
 Notary Public

14/5/25

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 named 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., 8A, Sagar Apartment, 6 Tilak Marg, New Delhi-110001

Mob: 988888 4445, Email: siddharth.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 also 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 opposite party. To withdraw or compromise the said 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 the progress and in the course of 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 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 authorised 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 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 21st day of May 2025

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

SB
[SIDDHARTH BATRA] [ARCHNA YADAV]

Shivani Chawla
Chinmay Dubey
Rhythm Katyal
[SHIVANI CHAWLA] [CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates

For RAJA INDUSTRIES

Baljit Bhatia
Client Prop.

RAJA INDUSTRIES

Plot No. 298, Ph-I, Barhi Indt. Area
Distt. Sonapat (Haryana)

NOTARY

100 Jaw
14/5/25

भारत सरकार
GOVERNMENT OF INDIA



साहित्य भाटिया
Sahil Bhatia
जन्म वर्ष / Year of Birth : 1995
पुरुष / Male



1026

आधार - आम आदमी का अधिकार

Sahil Bhatia

भारत सरकार
UNIQUE IDENTIFICATION AUTHORITY OF INDIA

पता: S/O राज भाटिया, अ-11,
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Sahil Bhatia

Advance service copies of short reply on behalf of Respondent Nos. 58, 71, 93, 94, 96 & 100 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

1 message

Vijay Kumar <vijay.kumar@satramdass.com>

Wed, May 21, 2025 at 3:03 PM

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

Cc: Chinmay Dubey <chinmay.dubey@satramdass.com>, Archana Yadav <archana.yadav@satramdass.com>, Shivani Chawla <shivani.chawla@satramdass.com>

 Paperbook- NGT Reply-R94 Samarth industries_Redacted.pdf

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 Paperbook-NGT REPLY-R71 DENIM CRAZE_Redacted.pdf

Dear Sir,

PFA.

Advance service copies of short reply on behalf of Respondent Nos. 58, 71, 93, 94, 96 & 100 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

SDB
SATRAM DASS B & CO.
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8A Sagar Apartment
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New Delhi - 110001
Landline - +91-11-47046111
vijay.kumar@satramdass.com

Satram Dass B & Co. made the following annotations

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