

BEFORE THE NATIONAL GREEN TRIBUNAL

EXECUTION APPLICATION NO 41 OF 2023

(EARLIER MA NO 16 OF 2023)

IN

ORIGINAL APPLICATION NO 94 OF 2021

IN THE MATTER OF

HAIDER ALI

...APPLICANT

VERSUS

UNION OF INDIA AND OTHERS

...RESPONDENTS

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NEW DELHI

FILED ON 2 JUL 2026

ADITYA VERMA

ENROLMENT NO: D/3454/2009

ADVOCATE FOR RESPONDENT NO 23

B5/52, BASEMENT, SAFDARJUNG

ENCLAVE NEW DELHI – 110029

ENROLMENT NO: D/3454/2009

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**THIRD ADDITIONAL REPLY ON BEHALF OF RESPONDENT
NO 23 (TAMIL NADU CRICKET ASSOCIATION – M A
CHIDAMBARAM STADIUM)**

1. That this third additional reply is being filed in continuation of the additional reply dated 17 Jul 2025 and the second additional reply dated 15 Jan 2026 filed by the answering Respondent.
2. That the additional reply dated 17 Jul 2025 stated *inter alia* as follows
(Para 4, Pg 3):

“However, subsequently, the answering Respondent has commenced a project for upgradation of the ground including excavation of the existing ground, killing the existing grass for weed control, change of the outfield from mud to sand, and eventually planting the grass on the ground (photographs at Annexure A, Pg 10). This project is expected to take several months, as a result of which no matches in the current domestic season, i.e. 2025-26, are scheduled to be held at the stadium.

At present, there are no upcoming international matches that have been allocated to the stadium either. In light of these developments, it is likely that the daily, monthly, and yearly water usage requirements will change, and the relevant figures as mentioned in the order dated 19 Mar 2025 will actually become known only once the project is completed.”

3. Thereafter, the answering Respondent filed the second additional reply dated 15 Jan 2026 stating *inter alia* as follows (**Para 2, Pg 2-3**):

“As a consequence of the aforesaid works that were undertaken, there were no watering requirements for the main stadium from Jun to the first week of Nov. Although no matches have been hosted by the answering Respondent at the MA Chidambaram stadium since the additional reply dated 17 Jul 2025, the present additional reply is being filed to provide an update as to the present state of affairs. Based on the estimates presently available, the yearly, monthly, and daily quantities of water required are set out below. These estimates are subject to revision and may be updated once the actual water use and requirement patterns are established over the course of the year. They account for an estimated forty-five match days during a year (i.e. days on which the main stadium is not watered), and an estimated twenty days during the north-east monsoon when natural rainfall suffices for the water

requirements. In other words, the entire green belt is expected to require watering for approximately 300 days in a year. On each day where watering is required, the estimated quantity of water is 120 KLD for the entire green belt. On this basis, the estimated average yearly, monthly, and daily requirements are as follows:

- *Yearly – 300 days x 120 KLD = 36,000 KL per year*
 - *Monthly – 36,000 KL / 12 months = 3,000 KL per month*
 - *Daily – 36,000 KL / 365 days = 99 KLD”*
4. Subsequent to second additional reply, the answering Respondent has commenced hosting matches. Therefore, this third additional reply is being filed to provide the further update mentioned in the second additional reply. The answering Respondent confirms that the average yearly, monthly, and daily requirements of water are as estimated earlier:
- Yearly – 300 days x 120 KLD = 36,000 KL per year
 - Monthly – 36,000 KL / 12 months = 3,000 KL per month
 - Daily – 36,000 KL / 365 days = 99 KLD
5. Needless to say, the orders of this Hon’ble Tribunal dated 19 Mar 2025, 17 Jul 2025, and 13 Oct 2025 also reflect the consistent compliance by the answering Respondent in the present proceedings.

6. In view of the above, it is reiterated in terms of para 10 of the reply dated 11 Aug 2024, para 8 of the additional reply dated 17 Jul 2025, and para 4 of the second additional reply dated 15 Jan 2026 that the Execution Application against the answering Respondent may be dismissed / disposed of without any further direction.

NEW DELHI
FILED ON 2 JUL 2026

ADITYA VERMA
ENROLMENT NO: D/3454/2009
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BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

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AFFIDAVIT

I, U Bhagwandas Rao, aged about 60 years, son of U Prabhakar Rao, having my office at No 5, Victoria Hostel Road, Chepauk, Chennai, Tamil Nadu – 600 005, do hereby solemnly affirm as follows:

1. That I am the Honorary Secretary of Respondent No 23 herein (i.e., M A Chidambaram Stadium, C/o the Tamil Nadu Cricket Association), and I am conversant with the facts of the case based on the records maintained. Hence, I am competent to swear this affidavit.
2. That the accompanying additional reply has been drafted as per my instructions. Its contents have been explained to me and I have understood the same. The contents of the Reply are true and correct to my knowledge based on the records of the case, and nothing material has been concealed therefrom.



For THE TAMIL NADU CRICKET ASSOCIATION

Hon. Secretary

DEPONENT

VERIFICATION

Verified at Chennai on this the 29th day of June 2026, that the contents of the above affidavit are true and correct to my knowledge based on the records of the case and the information received. Nothing material has been concealed therefrom.

For THE TAMIL NADU CRICKET ASSOCIATION

[Signature]
Gen. Secretary



DEPONENT

B. Ramesh Kumar
29/06/2026
B. RAMESH KUMAR, B.A., B.L.,
ADVOCATE & NOTARY PUBLIC
No. 6/777, 143rd Street, Muthamil Nagar,
Kodungaiyur, Chennai-600118.

3129

**Proof of service**

Ravi Kumar <ravi@adiadvocate.com> 7

Haider Ali v Union of India - EA 41 of 2023: Third Additional Reply on behalf of the Tamil Nadu Cricket Association ("TNCA") / Respondent No 23

1 message

Ravi Kumar <ravi@adiadvocate.com>

2 July 2026 at 14:02

To: sanobar ali Qureshi <sanobaraliqureshi@gmail.com>, egov-mowr@nic.in, secy-mowr@nic.in, gigicgeorge.adv42@yahoo.in

Cc: Aditya Verma <email@adiadvocate.com>, Parkhi Rai <parkhi@adiadvocate.com>

Dear Sir,

By way of Service, I attach the THIRD ADDITIONAL REPLY on behalf of the Tamil Nadu Cricket Association ("TNCA") / Respondent No 23 in the captioned matter before the Hon'ble National Green Tribunal, Principal Bench, New Delhi.

Regards,

Ravi Kumar

Registered Clerk: IC No 4671

Ph: 8285333807

For Mr Aditya Verma, Advocate on Record

**Final Third Addl Affidavit.pdf**

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