

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

Review Petition No. 9 of 2023

IN

Appeal No. 68 of 2019 (WZ)

IN THE MATTER OF:

M/s Grenesiis Constro Pvt. Ltd

...Petitioner

Versus

Mr. Vishal Arinjay Shah & Ors.

...Respondents

**REJOINDER ON BEHALF OF THE PETITIONER TO THE
PRELIMINARY REPLY AFFIDAVIT DATED 18.09.2024 FILED BY THE
RESPONDENT NO.1.**

ADVOCATE FOR PETITIONERS

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Drawn on: 21.10.2024

Filed on: 23.10.2024

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**REJOINDER ON BEHALF OF THE PETITIONER TO THE
PRELIMINARY REPLY AFFIDAVIT DATED 18.09.2024 FILED BY THE
RESPONDENT NO.1.**

IT IS MOST RESPECTFULLY SHOWETH:

1. At the outset, all the contentions, allegations and statements made by the Respondent No.1 in the Preliminary Reply Affidavit dated 18.09.2024 filed by the Respondent No.1 are denied and nothing herein shall be deemed to be admitted by the Petitioner by reason of non-traverse or otherwise, unless specifically admitted herein. It is submitted that the Preliminary Reply Affidavit filed by the Respondent No.1 is devoid of any merit.
2. The present Review Petition arises out of the Judgment dated 09.08.2023 passed by this Hon'ble Tribunal in Appeal No. 68.2019 (WZ) (hereinafter referred to as the "Impugned Judgment"). Vide the Impugned Judgment, this Hon'ble Tribunal was pleased to set-aside

the Ex-Post Facto Environment Clearance dated 09.08.2017 granted to the Petitioner by Respondent No.5 in terms of the Notification dated 14.03.2017 passed by the Ministry of Environment, Forest and Climate Change in exercise of the powers conferred by the sub-section (1) and sub-clause (a) of Clause (i) and Clause (v) of sub-section (2) of Section 3 of the Environment (Protection) Act, 1986 r/w Clause (d) of Sub-rule (3) of Rule (5) of the Environment (Protection) Rules, 1986.

3. Vide the Impugned Judgment the Hon'ble tribunal was pleased to set-aside the Environmental Clearance granted to the Petitioner as the Hon'ble Tribunal found that the Remediation Plan submitted by the Petitioner did not narrate 'a specific time-bound action plan' and yet, the Respondent No.5 was pleased to accord the Environmental Clearance to the Petitioner, thereby not being vigilant in ensuring the compliance of the plan by the Petitioner.
4. The Hon'ble Tribunal in order to conclude that a specific time-bound action plan for the purpose of Remediation was necessary relied on a letter dated 30.01.2019 issued by the Respondent No.5. On the basis of the said Letter the Hon'ble Tribunal had concluded that the Petitioner had not submitted any concrete time-bound and specific plan with regards to the Remediation Plan and Natural and Community Resource Augmentation Plan and therefore set-aside the Environmental Clearance dated 09.08.2017.
5. In the Review Petition as filed by the Petitioner, it is the specific case of the Petitioner that the reliance of this Hon'ble Tribunal on the Letter dated 30.01.2019 to impose a specific time-bound action plan is contrary to the Notification dated 14.03.2017 issued by the Ministry of Environment, Forest and Climate Change which has the force of Law.

6. That this Hon'ble Tribunal vide its Order dated 31.08.2023 after considering the submissions of the counsel of the Petitioner found that the Judgment dated 09.08.2023 had been delivered keeping in mind the Approach paper and therefore the grant of Ex-post facto Environmental Clearance to the project proponent was found to be erroneous. In view thereof the Hon'ble Tribunal was pleased to admit the Review Application of the Petitioner and issued notice to all the Respondents, returnable within four weeks.
7. On 18.09.2024, Respondent No.1 filed its Preliminary Reply Affidavit in the present Review Application before this Hon'ble Tribunal. This Hon'ble Tribunal vide its Order dated 18.09.2024 granted 2 weeks' time to the Petitioner to file its Rejoinder to the Preliminary Reply Affidavit dated 18.09.2024. Therefore, in terms of the order dated 18.09.2024, the Petitioner is filing the present Rejoinder.
8. It is submitted that the Respondent No.1 vide its Reply dated 18.09.2024 has primarily sought to raise the following points:
 - 8.1. That the Petitioner has placed reliance on the wrong Approach paper dated 30.01.2019 and that the final Approach paper dated 18.03.2019 was deliberately not placed before this Hon'ble Tribunal. Thus, the Petitioner has abused the process of law and misled this Hon'ble Tribunal.
 - 8.2. The Petitioner had placed a Civil Appeal in the form of a review Application for reopening the case for re-hearing, which is not maintainable. Further, the Review Application does not satisfy conditions from Order 47 & Section 114 & 115 of the CPC, 1908.
 - 8.3. That there is no error on the face of record and the Petitioner failed to show the clear-cut error or mistake in the Impugned Judgment. Any such error has been fished out and searched by

the Petitioner by way of the Review Petition to overcome the Civil Appellate Jurisdiction.

- 8.4. That as per Para-35 of the Final Approach Paper dated 18.03.2019, the Remediation Plan and Natural & Community Resource Augmentation Plan had to be implemented within 2 years.
- 8.5. The Letter dated 30.01.2019 does not have the force of law as it is read with the Notification dated 14.03.2017 and the provisions of the Letter are in consonance with the Notification as well as to fill up the gaps and to achieve the objective of the said Notification.
- 8.6. That this Hon'ble Tribunal does not have the powers of Judicial Review regarding the Legality and Validity of the Letter dated 30.01.2019.

PARA-WISE REPLY:

- A. The contents of the Respondent No.1 in Part-A are brief facts and therefore need no reply.
- B. Reply to Part-B
 - i. The Respondent No.1 in Part-B of the Reply has alleged that the Petitioner had filed old Research paper with the Letter dated 30.01.2019 and failed to file the Final Approach paper dated 18.03.2019 which is the Final assessment for Environmental Damage and Estimation of Remediation Cost for building, construction projects initiated without obtaining Environmental Clearance. Further it has been stated that the EC was granted on 09.08.2019 with General Conditions and Specific Conditions and the Petitioner was required to implement the project for Remediation Plan and Natural Plan and

Community Augmentation Plan, however, the Petitioner failed to comply with the same.

- ii. In this regard it is submitted that this Hon'ble Tribunal while passing the Impugned Order dated 09.08.2023 has set-aside the Environmental Clearance 09.08.2017 on the basis of the Approach Paper dated 30.01.2019 and therefore the Petitioner vide the Review Petition has relied on the Approach Paper dated 30.01.2019 and not any other Approach Paper.
- iii. It is submitted that The Respondent No. 4 on 14.03.2017 in exercise of its powers conferred by Sub-section (1) and sub-clause (a) of Clause (i) and Clause (v) of Sub-section (2) of Section 3 of Environment (Protection) Act, 1986) r/w Clause (d) of Sub-rule (3) of Rule 5 of the Environment (Protection) Rules, 1986 issued a Notification by which the Respondent No. 4 directed that the project or activities or the expansion or modernization of existing projects or activities requiring prior EC under the EIA Notification 2006, without obtaining prior EC, shall be considered a case of violation of the EIA Notification 2006 and would be dealt strictly as per the procedure specified in the said Notification. In terms of Clause 13(5) of the Notification, the EAC was to prescribe specific TOR for the project on Assessment of Ecological Damage, Remediation Plan and Natural and Community Resource Augmentation Plan. Furthermore, the Environment Management Plan was to comprise of the Remediation Plan and the Natural and Community Resource Augmentation Plan corresponding to the Ecological Damage Assessed and Economic Benefit derived due to violations of condition of EC in terms of Clause 13(6). Clause 13(7), required the Project Proponent to submit, a Bank Guarantee equivalent to the amount of the Remediation Plan and Natural and Community Resource Augmentation Plan with the State Pollution Control Board.

- iv. The Bank Guarantee was to be released after successful implementation of the Remediation Plan and the Natural and Community Resource Augmentation Plan. Thus, the Notification dated 14.03.2017 did not stipulate a 'specific time bound action plan' for executing the Remediation Plan. As long as the Remediation Plan and the Natural and Community Resource Augmentation Plan were not successfully implemented, the bank guarantee of the Project Proponent was not to be returned and remained with the Authorities like a surety.
- v. The constitutional validity of the Notification dated 14.03.2017 was challenged before the Hon'ble High Court of Judicature of Madras in W.P. No. 11189 of 2017. The Hon'ble High Court vide its Judgment dated 13.10.2017 upheld the Constitutional Validity of the Notification dated 14.03.2017 which was also considered by the Hon'ble Supreme Court in 2021 SCC OnLine SC 1247, 2022 SCC OnLine SC 1278 & 2022 SCC OnLine SC 362. Thus, the validity of the Notification dated 14.03.2017 according Ex-post facto EC to projects commenced without obtaining prior EC having been upheld, the Notification dated 14.03.2017 is legislative in nature and has the force of law.
- vi. On 30.01.2019, the Respondent No. 5 addressed a letter to the Chairmen of the SEAC, with regards to the procedure to be adopted for dealing with the EC violation cases in pursuance of the Notification dated 14.03.2017. Vide the said letter, the Respondent No. 5 informed that a Committee was constituted for evaluation process to evolve uniform guidelines to deal with cases of violation. The said Committee submitted its report on Assessment for Environmental Damage and Estimation of the Remediation Cost and further directed the Authorities to appraise the proposals under violation in terms of the Notification dated 14.03.2017 as per the Report. It is submitted that, the Respondent No. 1 in the Appeal No. 68 of 2019 (WZ) never relied on the letter dated

30.01.2019, nor the said letter forms a part of the record of the Appeal Paper Book filed by the Respondent No. 1. The said letter was never brought on record, nor the same was put to the parties before being considered by this Hon'ble Tribunal in the Impugned Judgment.

vii. Be that as it may, on perusing the said report, the tenor of the said report is suggestive and not directive. The same can be derived from the fact that at Paragraph 16(c) of the said report, it is candidly admitted that there is no time limit or verification methodology defined for the implementation of the Notification dated 14.03.2017. It is submitted that the reliance rely upon a letter dated 30.01.2019 issued by the Respondent No. 5 with regards to the procedure to be adopted while dealing with the Environmental Violation cases in terms of the Notification dated 14.03.2017 is erroneous.

viii. It is a settled principle of law that any order or notification made or issued in exercise of a non-statutory power or in exercise of a statutory power which is purely executive in nature, the same shall have no legislative content and will not amount to law. In the present case, it is the specific case of the Petitioner that the Hon'ble Tribunal erred in considering that the Letter dated 30.01.2019 was merely executive in nature without any Legislative Content and force of Law. Therefore, between the execution of the provisions of the Notification dated 14.03.2017 and the letter dated 30.01.2019, the provisions of the Notification dated 14.03.2017 would prevail in order to implement the "Rule of Law". However, in the present case, the Hon'ble Tribunal has applied the Guidelines of the Letter dated 30.01.2019 over the Notification dated 14.03.2017 resulting in an error apparent. Thus, whether it is the Approach Paper dated 30.01.2019 or the Approach Paper dated 18.03.2019, the provisions of the Notification dated 14.03.2017 would be prevail.

ix. The Petitioner herein was only bound by the mandate/procedure provided under the said Notification. Therefore, the Petitioner applied for the Environmental Clearance in terms of the Notification dated 14.03.2017 and had obtained the Environmental Clearance on 09.08.2019. In light of the above-mentioned judgments the said Environmental Clearance had obtained the Force of law and was constitutionally valid.

C. Reply to Part-C:

i. In Part-C of its Reply dated 18.09.2024, the Respondent No. has claimed that the Review Application at the behest of the Petitioner is not maintainable as the Petitioner had placed a Civil Appeal in form of a Review therefore seeking re-hearing of the Case. In this regard, it is submitted that, it is Respondent No.1 which had invoked the Appellate Jurisdiction of this Hon'ble Tribunal vide Appeal No. 68/2019 (WZ) being aggrieved by the Ex-Post Facto Environmental Clearance dated 09.08.2019 granted to the Petitioner. The contention raised by the Respondent No.1 was only with regard to the validity of the Environmental clearance which was against the Basic Principles of Environmental Jurisprudence in the eyes of the Respondent No.1. Further, it was contended that Respondent No.5 on a complete non-application of mind appraised the project of the Petitioner. It is submitted that the Petitioner herein was only governed by the Notification dated 14.03.2017 for grant of Environmental Clearance. Further, the Petitioner in compliance of the 85th Minutes of the Meeting of the SEAC had submitted a Bank Guarantee of Rs. 1.95 Crores. This Hon'ble Tribunal had erroneously cancelled the Environmental Clearance vide the Impugned Judgement by placing reliance on the Letter dated 30.01.2019.

- ii. As already stated hereinabove the Letter dated 30.01.2019 is contrary to the notification dated 14.03.2017 to the extent that the Notification dated 14.03.2017 did not stipulate a “Specific Time Bound Action Plan” for executing the Remediation Plan. In such circumstances, the Notification dated 14.03.2017 would prevail over the Letter dated 30.01.2019 and therefore the reliance of the Hon’ble Tribunal on the Letter dated 30.01.2019 is the error apparent on the face of the record.
- iii. That powers of the Review can be invoked if there is an error apparent on the face of the record. The Hon’ble Tribunal had erroneously passed the Impugned Judgment without taking into consideration that the Letter dated 30.01.2019 was not on record and was not relied by either of the parties. Further, (Para 16-C) of the Research paper dated 18.03.2019 itself states that there is no time-limit for implementation of the project. Therefore, the Hon’ble Tribunal has erroneously set-aside the Environmental Clearance dated 09.08.2019 and ought to consider Para 16-C of the Report. Thus, the present Review Petition is maintainable because the Petitioner filed the present review petition as there was an error that was apparent on the face of the record.
- iv. It is also contended by the Respondent No.1 that the Petitioner failed to show any clear cut mistake in the Impugned Judgment dated 09.08.2023. In this regard, it is submitted that the Hon’ble Tribunal has erred on two distinct grounds. Firstly, the Hon’ble Tribunal failed to take into consideration that the Respondent No.1 in the Appeal No. 68/2019 (WZ) neither relied on the Letter dated 30.01.2019 nor the said letter forms a part of the record of the Appeal Paperbook filed by the Respondent No.1. The Letter dated 30.01.2019 was never brought on record, nor the same was put to the parties before being considered by this Hon’ble Tribunal while passing the Impugned Judgment.

Secondly, the Letter dated 30.01.2019 was not having force of law in terms of Article 13(3)(a) of the Constitution of India, the Letter was contrary to the Notification dated 14.03.2017 and thus by placing reliance on reliance on such Letter this Hon'ble Tribunal had committed a grave mistake. Also, Para 16(c) of the Approach Paper dated 30.01.2019 as well as Research Paper dated 18.03.2019 expressly stipulates that there is no time limit for implementation of the Remediation Plan and Natural and Community resource augmentation plan. Neither in the provisions of the Notification dated 14.03.2017 nor the conditions of the Environmental Clearance dated 09.08.2019 had specified any "*Specific Time Bound Action Plan*" which the Petitioner had to comply with while submitting its Bank Guarantee. Thus, the Petitioner vide the present review Petition has been able to show all these irregularities in the Impugned Order passed by this Hon'ble Tribunal.

D. Reply to Part-D,

- i. The Respondent No.1 in Para 4.1 of Part-D of its Reply dated 18.09.2024 states that provisions of Clause 13 (5)(6)(7) of the Notification dated 14.03.2017, puts burden on the EAC/SEAC/SEIAA for detailed plans and its implementation while granting the TOR and then to impose the conditions while granting the EC. However, the Respondent No.1 has not been able to show how the Notification puts any kind of an obligation on the Authorities for timely implementation of the Remediation Plan and Natural & Community Resource Augmentation Plan when no such timeline has been provided by the Notification itself.
- ii. On perusing the Notification dated 14.03.2017, in terms of Clause 13(5) of the Notification, the EAC was to prescribe specific TOR for

the project on Assessment of Ecological Damage, Remediation Plan and Natural and Community Resource Augmentation Plan. Furthermore, the Environment Management Plan was to comprise of the Remediation Plan and the Natural and Community Resource Augmentation Plan corresponding to the Ecological Damage Assessed and Economic Benefit derived due to violations of condition of EC in terms of Clause 13(6). Clause 13(7), required the Project Proponent to submit a Bank Guarantee equivalent to the amount of the Remediation Plan and Natural and Community Resource Augmentation Plan with the State Pollution Control Board. The Bank Guarantee was to be released after successful implementation of the Remediation Plan and the Natural and Community Resource Augmentation Plan. Thus, the Notification dated 14.03.2017 did not stipulate a 'specific time bound action plan' for executing the Remediation Plan, nor did it put any burden on EAC/SEAC/SEIAA for detail time-bound plans. As long as the Remediation Plan and the Natural and Community Resource Augmentation Plan were not successfully implemented, the bank guarantee of the Project Proponent was not to be returned and remained with the Authorities like a surety. In such circumstances, the provisions of Clause 13(7) of the Notification would prevail over the Letter dated 30.01.2019 and therefore, no restriction with regards to a specific timeline was necessary for the purpose of implementing the Remediation Plan and the Natural and Community Resource Augmentation Plan. Thus, this Hon'ble Tribunal erred in withdrawing the EC accorded to the Petitioner merely because the Petitioner failed to provide a specific time bound action plan as same was not necessary in terms of the Notification dated 14.03.2017.

- iii. Further, the Respondent No.1 has contended that the Letter dated 30.01.2019 was an administrative instruction which can fill the gaps and supplement the rules, thus having a force of law. Also, the Respondent has relied on **1968 1 SCR 111**, to show the enforceability of the Letter dated 30.01.2019 which allegedly was the document to decide grant of Environmental Clearance. As per the Judgement it is stated that *“It is true that Government cannot amend or supersede statutory rules by administrative instructions, but if the rules are silent on any particular point government can fill up the gaps and supplement the rules and issue instructions not inconsistent with the rules already framed.”* It is pertinent to note here that any such instructions shall not be inconsistent with the rules already framed. That the Notification dated 14.03.2017 was a statutory notification which was passed by the Ministry of Environment, Forest and Climate Change in exercise of the powers conferred by the sub-section (1) and sub-clause (a) of Clause (i) and Clause (v) of sub-section (2) of Section 3 of the Environment (Protection) Act, 1986 r/w Clause (d) of Sub-rule (3) of Rule (5) of the Environment (Protection) Rules, 1986. The said Notification was constitutionally valid and had obtained the force of Law vide Judgment dated 13.10.2017 on Writ Petition No. 11189/2017, **2021 SCC OnLine SC 1247**, **2022 SCC OnLine SC 1278** and **2022 SCC OnLine SC 362**. Thus, any such instruction which is not in conformity with provisions of the Notification will not be read as a part and parcel of the Notification or as instruction aiding the implementation of the provision of the Notification. The Letter being in violation of the Notification dated 14.03.2017 cannot be said to be a law in terms of Article 13(3)(a) of the Constitution of India.
- iv. The Respondent in Para-4.2 of Part-D of its Reply dated 18.09.2024 has claimed that the Petitioner has relied on the Damage Report

attached with the Letter dated 30.10.2019 and therefore the conduct of the Petitioner is self-contradictory. It is submitted that the Petitioner herein has neither relied on the Letter dated 30.01.2019 nor it has relied on any Report/Research paper attached with the Letter. The Respondent has only thrown light on the relevant part of the report which itself suggest that there was no time period for implementation of the Remediation Plan. Further, the Petitioner had only stated about the nature of such letter and the report which was only suggestive in Nature. Thus, neither the Letter dated 30.01.2019 nor the Damage Report attached with it made it mandatory for the Petitioner to follow any timeline for implementation of the Remediation Plan.

v. In Para 4.3 of Part-D of the Reply dated 18.09.2024, the Respondent has claimed that the contention of the Petitioner that the Letter dated 30.01.2019 was not a part of the pleadings is wrong. The Respondent No.1 states that Letter dated 30.01.2019 is the Cover page of the Research Paper dated 18.03.2019 and the Petitioner has wrongly relied on the Old version of the Research paper in its Review Petition. In this regard, as already stated hereinabove, it is the case of the Petitioner that whether it be the Research Paper dated 30.01.2019 or 18.03.2019, any Approach paper in contradiction with the Notification dated 14.03.2017 would not have the force of law and therefore the Petitioner would not be bound by it.

vi. Further, in Para 4.4 of Part-D of the Reply dated 18.09.2024, the Respondent No.1 has contended that the Remediation Plan and Natural and Community Resource Augmentation Plan shall be implemented within a period of 2 years as per Para No. 35 of the Research paper dated 18.03.2019. However, as already stated hereinabove any research paper in contradiction to the Notification

dated 14.03.2017 shall not have the force of law and the Petitioner shall not be bound by it.

vii. Lastly, in Para 4.6 of Part-D of the Reply dated 18.09.2024 the Respondent has wrongly relied on the Judgment dated 18.02.2019 in Civil Appeal No. 4763-4764 of 2013 passed by the Hon'ble Supreme Court. It is submitted that the Petitioner herein has not challenged the Legality or validity of the Letter dated 30.01.2019, however is only challenging the reliance placed on the Letter dated 30.01.2019 which is contrary to the Notification dated 14.03.2017.

9. The Contents of Part-E and F need no Reply.

10. In view of the aforesaid submission, it is apparent that the Reply dated 18.09.2024 filed by the Respondent No.1 is devoid of any merit and therefore ought not to be relied by this Hon'ble Tribunal. Further in the facts and the circumstances stated hereinabove it is prayed that the present Review Petition be allowed and the Impugned Judgment dated 09.08.2023 passed by this Hon'ble Tribunal in Appeal No. 68/2019 (WZ) be set-aside.



Advocate for Petitioner

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Drawn on: 21.10.2024

Filed on: 23.10.2024

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL



WESTERN ZONE BENCH, PUNE

Review Petition No. 9 of 2023

IN

Appeal No. 68 of 2019 (WZ)

Noted & Registered	
At. Serial No.	5785
Date	21-10-2024

IN THE MATTER OF:

M/s GrenesiisConstro Pvt. Ltd

...Petitioner

Versus

Mr. Vishal Arinjay Shah

&Ors.

...Respondents

AFFIDAVIT

I, Mr. Arinjay Pramod Korgaonkar, Age: Adult, Occupation: Business, having Office at: A-501, Thacker' House, 2418, East Street, GT Road, Camp, Pune-411001, do hereby solemnly affirm and state as under:

1. That I am the Petitioner in the present Review Petition before this Hon'ble Tribunal. I am conversant with the facts and circumstances of the case and as such competent to swear the present Affidavit.
2. That the contents of the present Rejoinder are facts true to my knowledge and also contain submissions and prayers to this Hon'ble Tribunal based on legal advice and the same is believed to be true and correct.

DEPONENT



Page No. 01 Dt. 21-10-2024
 Kalindi D. Surate
 Advocate & Notary
 Regd. No. 15113

VERIFICATION

Verified at Solapur on this 21 day of October, 2024 that the contents of the present affidavit are true and correct and nothing material has been concealed therefrom.



Koyamcesh
DEPONENT

Noted & Registered	
At. Serial No.	5785
Date	21-10-2024



Explained and Identified by *Koyamcesh*
अड. लक्ष्मी ना. पडुगा
बी. कॉम., एलएल. बी.
सोलापूर. मोबा नं - 9325730762




Solemnly affirmed before me by
Shri. Dattajay Premad
Koyamcesh
अड. लक्ष्मी ना. पडुगा
बी. कॉम., एलएल. बी.
सोलापूर. मोबा नं - 9325730762
Who is identified by Shri.....
Whom / personally know
Date :- 21/10/2024

BEFORE ME
KALINDI D. SURATE
NOTARY
GOVT OF INDIA
REG. NO 15113

Page No. 02 Dt. 21-10-2024
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Korjambur





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PROOF OF SERVICE

Service: RP No. 09 of 2023 in Appeal No. 68 of 2019 (WZ) between M/s Grenesiis Constro Pvt. Ltd. V. Mr. Vishal Arinjay Shah & Ors before the Hon'ble National Green Tribunal, Western Zone Bench Pune at Pune.

4 messages

Adv Sangramsingh R Bhonsle <srb.chambers@gmail.com>

Wed, Oct 23, 2024 at 12:36 PM

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Cc: Sangramsingh Bhonsle <sangramsinghbhonsle@gmail.com>, Samridhi Jain <samridhi12318@gmail.com>

Sir,

We are the Advocates appearing on behalf of the Petitioner in the abovementioned matter. We are filing an Rejoinder on behalf of the Petitioner on 23.10.2024.

Please find attached herewith the copy of the same and consider this email as the service of the same on your esteemed office.

Regards,

Sangramsingh R. Bhonsle

Advocate On Record

Supreme Court of India

H-5, Second Floor, Lajpat Nagar III,

New Delhi - 110024.

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