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

IN THE MATTER OF: Original Application No 672/2025 – Varun Luthra Vs Central Ground Water Authority of India & Others

REPLY ON BEHALF OF RESPONDENT NO. 5

MOST RESPECTFULLY SUBMITTED:

1. I have received a notice in the above-mentioned matter. However, I respectfully submit that I fail to understand the basis on which I have been impleaded as a Respondent, as I have no concern, connection, involvement, or interest whatsoever in the subject matter of the present proceedings.

2. I submit that I have no knowledge of, involvement in, or responsibility for any alleged borewell, groundwater extraction activity, or any environmental issue forming the subject matter of the present application. I am neither the owner, operator, controller, nor beneficiary of any such activity and have no nexus whatsoever with the allegations made in the present case.

3. I further submit that on 28.01.2022, Mr. Varun Luthra, along with one Mr. Abhishek Verma, visited my family's under-construction residential property situated at BD-9, Pitampura, Delhi – 110034. As my father was not present at the site, I personally interacted with them and enquired about the purpose of their visit.

4. During the interaction, they threatened and intimidated me by stating that if my father did not entertain them, they would ensure that our construction work was stopped. I asked them to disclose the authority, department, or organization they represented and requested them to produce their identity cards or any authorization. However, they refused to do so and continued with their threatening conduct and misbehaved with me.

5. Owing to the circumstances, I called the local police for assistance. The police arrived at the site and intervened in the matter. Thereafter, my father lodged a formal complaint, pursuant to which FIR No. 0226 dated 29.01.2022 was registered. A copy of the said FIR is annexed herewith as Annexure R-1. I have also given statement under section 164 in front of magistrate at Rohini Court following my complaint.

6. I respectfully submit that following the registration of the aforesaid FIR, there have been repeated attempts to exert pressure upon me and my family to withdraw the complaint through various local goons and politicians. To the best of my knowledge, proceedings arising out of the said dispute are presently pending before the competent court and a chargesheet has been filed for the same. In view thereof, I refrain from making any further comments on the merits of those proceedings.

7. In these circumstances, I have reasonable grounds to believe that my inclusion as a Respondent in the present proceedings is neither bona fide nor justified and appears to be connected with the aforesaid dispute, to scare and compel me and my family to withdraw our complaint. I respectfully submit that I have been unnecessarily impleaded despite having

no connection whatsoever with the allegations relating to borewell operation, groundwater extraction, or any environmental violation.

8. In view of the foregoing facts and circumstances, I respectfully submit that my name has been wrongly included in the array of parties and deserves to be deleted from the present proceedings.

PRAYER

In light of the above facts and submissions, I most respectfully pray that this Hon'ble Tribunal may be pleased to:

a) Delete my name from the array of Respondents in the present matter;

b) Discharge me from the present proceedings, as no cause of action exists against me;

c) Pass any other order(s) that this Hon'ble Tribunal may deem fit and proper in the interest of justice.

I shall remain grateful for the same.

Place: New Delhi

Date: 02-07-2026

Shivani

Name: Shivani Aggarwal
Respondent No. 5

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

ORIGINAL APPLICATION NO. 672 OF 2025

IN THE MATTER OF:

VARUN LUTHRA ...APPLICANT

VERSUS

CENTRAL GROUND WATER AUTHORITY OF INDIA & ORS. ...RESPONDENTS

AFFIDAVIT

I, SHIVANI AGGARWAL, Daughter of Shri Vijay Kumar Aggarwal, aged about 30 years, residing at BD-9 Vikhakha Enclave Pitam Pura, New Delhi, Respondent No. 5 in the above-mentioned matter, do hereby solemnly affirm and declare as under:

1. That I am Respondent No. 5 in the above-mentioned matter and am well acquainted with the facts and circumstances of the case and am competent to swear this affidavit.
2. That the accompanying Reply on behalf of Respondent No. 5 has been drafted and filed by me in person and the contents thereof are true and correct to the best of my knowledge and belief.
3. That I crave leave of this Hon'ble Tribunal to read the contents of the accompanying Reply as an integral part and parcel of this affidavit, as the same are not being repeated herein for the sake of brevity.

Shivani

DEPONENT

VERIFICATION

- 1 JUL 2026

Verified at New Delhi on this 30th day of June, 2026, that the contents of the above affidavit and the accompanying Reply are true and correct to the best of my knowledge and belief and that no part thereof is false and nothing material has been concealed therefrom.

DEPONENT

Shivani

I Identify the deponent who has signed in my presence

The Seal of Oath Commissioner S.L. No. 63/2025 HARI SHANKER GIRI App. By. Delhi High Court Period-15/07/2025 to 14/07/2027 Tis Hazari Court Delhi-110054

CERTIFIED THAT THE DEPONENT Shri/Smt./Km. ... S/o W/o D/o ... R/o ... Identified by Shri/Smt. ... has solemnly affirmed before me at Delhi on - 1 JUL 2026 at Sl. No. ... that the Contents of the affidavit which have been read and explained to him are true and correct to his knowlwdge.

Oath Commissioner Delhi

- 1 JUL 2026

R1 : ANNEXURE - 1

FIRST INFORMATION REPORT

(Under Section 154 Cr.P.C.)

(धारा 154 दंड प्रक्रिया संहिता के तहत)

1. District (जिला): NORTH WEST (DELHI) P.S.(थाना): MAURYA ENCLAVE Year(वर्ष): 2022 FIR No(प्र.सू.रि.सं.):0226 Date : 29/01/2022

2. Act(s)(अधिनियम): Section(s)(धारा(एँ)):
   - IPC 1860 419/170/385/509/34

3. Occurrence of Offence (अपराध की घटना):
   (a) Day(दिन): Date From(दिनांक से): Date To(दिनांक तक):
   Time Period (समय अवधि): Time From (समय से): Time To (समय तक):
   (b)Information received at P.S.(थाना जहां सूचना प्राप्त हुई): Date(दिनांक): 29/01/2022 Time (समय): 20:55 hrs
   (c)General Diary Reference (रोजानामचा संदर्भ): Entry No.(प्रविष्टि सं.): 093A Date (दिनांक/समय):29/01/2022 20:59

4. Type of Information (सूचना का प्रकार): Written

5. Place of Occurrence (घटनास्थल):
   (a) Direction and Distance from P.S (थाना से दूरी और दिशा): NORTH-WEST , 1.5 Km(s) Beat No(बीट सं.) : 08
   (b) Address(पता): BD- 9 ,VISHAKA ENCLAVE ,PITAM PURA DELHI
   (c) In case, Outside the limit of the Police Station (यदि थाना सीमा के बाहर है):
   Name of P.S(थाना का नाम): District(ज़िला):

6. Complainant / Informant (शिकायतकर्ता/सूचनाकर्ता):
   (a) Name(नाम): VIJAY K AGGARWAL (S/O) LATE M L AGGARWAL
   (b)Date/Year of Birth (जन्म तिथि /वर्ष): 1962 Nationality (राष्ट्रीयता): INDIA
   (c)Passport No.(पासपोर्ट सं.): Date of Issue (जारी करने की तिथि): Place of Issue (जारी करने का स्थान):
   (d)Occupation (व्यवसाय): NOT KNOWN
   (e)Address(पता): TU-34, FIRST FLOOR, PITAMPURA, DELHI -34, MAURYA ENCLAVE, NORTH WEST, DELHI, INDIA, 9810727040,

7. Details of Known/Suspect/Unknown accused with full particulars(attach separate sheet if necessary)(ज्ञात/ संदिग्ध /अज्ञात अभियुक्त का का पुरे विवरण सहित वर्णन):

8. Reason for delay in reporting by the complainant/informant (शिकायतकर्ता / सूचनाकर्ता द्वारा रिपोर्ट देरी से दर्ज कराने के कारण):
   NO DELAY

9. Particulars of the properties stolen/involved (attach separate sheet if necessary):
   Sl.No. (क्र.सं.) Property Type(Description) Est. Valu ल्य (रु में))

10. Total value of property stolen (चोरी हुई सम्पत्ति का कुल मूल्य):

11. Inquest Report / U.D. Case No., if any (मृत्यु समीक्षा रिपोर्ट / यू.डी.प्रकरण न., यदि कोई हो):

District : NORTH WEST (DELHI) P.S: MAURYA ENCLAVE Year: 2022 FIR No: 0226 Date: 29/01/2022

12. F.I.R. Contents (attach separate sheet, if required)(प्रथम सूचना रिपोर्ट तथ्य):

To SHO PS Maurya Enclave Pitam Pura Delhi 34 Sir, With kind request this is to inform you that I am Vijay K. Aggarwal R/o BD- 9 Vishaka Enclave Pitam pura Delhi. My site is under construction. On 27 January 2022, 2 unknown men entered my property without permission posing as office from the SDM Office. When I reached the site, they threatened me to close my construction site. And entered the premiseses again. They then asked me to give them. Rs 20,000/-. When I asked them to show away I. D Card, they refused and misbehaved. They again threatened me that if I do not pay them, they will be dire consequences. They said they will visit again. I called SDM office and told that 2 officers had visted and asked for money. The SDM Office that no one from their office has visited, and me should inform them, if they come again. On 28 January 2022, they visited my property and asked for money again. We informed the SDM office about it and SDM Officers came to the site. As I was not available My daughter Shivani Aggarwal went to the site. She tried to ask them about the I.D, they misbehaved with her and said vulgar things and abused her. They told her their names to be Abhishek Verma and Varun Luthra. She then called the police as they were threatening her also. After this my daughter came to the police station. I also came directly to the police station to file the complaint. You are requested to please help us and look into the matter. Please take some string action as we are very scared and regsiter the FIR against the accused in appropraite sections of law. Vijay K. Aggarwal S/o Late M.L. Aggarwal, Present Address TU-34, First Floor, Pitampura, Delhi -34 Mob No. 9810727040. As per the contents of the complaint by Sh Vijay Aggarwal and seperate complaint received from SDM/Saraswati Vihar vide Diary No 511 Dt 29/01/22, Duty officer to regsiter the case u/s 419/170/385/509/34 IPC and as per the directions of the senior officers investigation will be carried out by Insp Sunil Kumar, Vigilance Branch/ NWD Insp Mukesh Kumar, SHO/Maurya Enclave DT 29/01/22. पुलिस कार्यवाही थाना एक Complaint लिखित लेख English Insp. Mukesh Kumar SHO साहब PS Maurya Enclave के द्वारा मुकदमा दर्ज Register करने के लिए मन SI/DO को लेख दरपेश थाना मे Receive होने पर, Case FIR No. 226/2022, U/s 419/170/385/509/34 IPC का registration Computer Operator द्वारा CCTNS Computer मे Registration कराकर Original Article With Computerized copy FIR Ct. Dharmendra No. 2040/PCR द्वारा Insp. Sunil Kumar, Vigilance Branch /NWD साहब के पास भिजवाई जा रही है। Detail Fact And FIR Copy By Post Senior Officer को भिजवाई जाएगी।

13. Action Taken Since the above information reveals commission of offence(s) u/s as mentioned at Item No. 2:
(की गयी कार्यवाही: चूंकि उपरोक्त जानकारी से पता चलता है कि किया गया अपराध मद सं.2.में उल्लेख धारा के तहत है):

(i) Registered the case and took up the investigation: OR (या)
(प्रकरण दर्ज किया गया और जांच के लिए लिया गया):

(ii) Directed (Name of the I.O.)(जांच अधिकारी का नाम): SUNIL KUMAR Rank (पद): I (INSPECTOR)

No(सं.): 28823714 to take up the investigation (को जांच आपने पास में लेने के लिए निर्देश दिया गया) OR(या)

(iii) Refused investigation due to(जांच के लिए): OR (के कारण इंकार किया या)

(iv) Transferred to P.S(name)(थाना): District(ज़िला):
on point of jurisdiction (को क्षेत्राधिकार के कारण हस्तांतरित)

F.I.R read over to the complainant/informant,admitted to be correctly recorded and a copy given to the complainant/informant, free of cost : (शिकायतकर्ता / सूचनाकर्ता को प्राथमिकी पढ़ कर सुनाई गयी, सही दर्ज हुई माना और एक कॉपी निशुल्क शिकायतकर्ता को दी गयी) :

R.O.A.C.(आर.ओ.ए.सी.):

District : NORTH WEST (DELHI) P.S: MAURYA ENCLAVE Year: 2022 FIR No: 0226 Date: 29/01/2022

14. Signature / Thumb Impression
of the Complainant / Informant:
(शिकायतकर्ता / सूचनाकर्ता के हस्ताक्षर / अंगूठे का निशान):

Signature of Officer

Name(नाम): OM PARKASH

Rank (पद): SI (SUB-INSPECTOR)

No.(सं.): 28900267

15. Date and Time of despatch to the court:
(अदालत में प्रेषण की दिनांक और समय):