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

**I.A. NO. _____ OF 2021**
**IN**
**C.P. NO. (IB)-1082(PB)/2018**

**IN THE MATTER OF:**

**ALCHEMIST TOWNSHIP INDIA LIMITED**
FLAT NO- 1511 (Front Portion), Hemkunt Chambers,
89, Nehru Place, New Delhi 110019

**.....Corporate Debtor**

**AND IN THE MATTER OF:**

Devendra Singh **.. Resolution Professional**

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**DEVENDRA SINGH**
Resolution Professional
In the matter of Alchemist Township India Limited
Regn No. IBBI/IPA-002/IP-N00001/2016-17/10001
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**PLACE: New Delhi**
**DATED: 19.10.2021**

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89, Nehru Place, New Delhi 110019

**.....Corporate Debtor**

**AND IN THE MATTER OF:**

Devendra Singh **.. Resolution Professional**

**SIXTH PROGRESS REPORT FILED BY DEVENDRA SINGH, RESOLUTION PROFESSIONAL IN THE MATTER OF ALCHEMIST TOWNSHIP INDIA LIMITED**

1. That the application was filed under Section 7 of Insolvency and Bankruptcy Code, 2016 read with Rule 4 of the Insolvency and Bankruptcy (Application to Adjudicating Authority) Rules, 2016 on 07.08.2018 by Ms. Kiran Malhotra, as the Financial Creditor with the prayer to commence the Corporate Insolvency Resolution Process (CIRP) against the Alchemist Township India Limited (ATIL), Corporate Debtor.

2. That the said application IB No. 1082/PB/2018 for initiation of Corporate Insolvency Resolution Process (CIRP) was admitted by Hon'ble National Company Law Tribunal (NCLT), Principal Bench, New Delhi vide its order dated 25.01.2019, wherein the CIRP of ATIL was commenced and Mr. Pramod Goel, was appointed as the Interim Resolution Professional (IRP). Copy of the order was received by the IRP on 30.01.2019.

3. That in terms of the provisions under Section 15 of the IBC, 2016 read with Regulation 6 of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations,



2016, the Public Announcement in Form A with respect to commencement of CIRP of ATIL was made on 02.02.2019 and Form A was published in Financial Express (English), Jansatta in Delhi NCR & Chandigarh and Daily Chardhikala (Punjabi) in Patiala region on 02.02.2019.

4. That the shareholder of the Corporate Debtor, Alchemist Infra Ventures Ltd. filed an appeal before the Hon'ble NCLAT, New Delhi vide Company Appeal (AT) (Insolvency) No. 113 of 2019 against the admission order of Hon'ble NCLT, New Delhi dated 25.01.2019. In the hearing held on 12.02.2019 before the Hon'ble National Company Law Appellate Tribunal, New Delhi, the Appellant intended to settle the matter with the Respondent. On the request of the learned counsel for the appellant, the Hon'ble Adjudicating Authority gave direction to IRP that if no 'Committee of Creditors' have been constituted, the IRP will not constitute the Committee of Creditors until further orders. The matter listed for 01.03.2019 for further proceedings.

5. That in the hearing held on 01.03.2019, the Hon'ble NCLAT, New Delhi set aside the order of Hon'ble NCLT New Delhi dated 25.01.2019. The relevant part of the order is reproduced hereunder:

**As per Para 6 of the order dated 01.03.2019**

*"order(s) passed by the Adjudicating Authority appointing 'Interim Resolution Professional', declaring moratorium, freezing of account, and all other order(s) passed by the Adjudicating Authority pursuant to impugned order and action, if any, taken by the 'Interim Resolution Professional', including the advertisement published in the newspaper calling for applications all such orders and actions are declared illegal and are set aside. The application preferred by Respondent under Section 7 of the I&B Code, 2016 is dismissed. Learned Adjudicating Authority will no close the*

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*proceeding. The Corporate Debtor' (Company) is released from all the rigour of law and is allowed to function independently through its Board of Directors from immediate effect."*

**The Hon'ble Adjudicating Authority further ordered in its order dated 01.03.2019**:

*"However, we make it clear that the amount payable in favour of Respondent – 'Kiran Mallhotra'through cheque, if bounce or for one or other reason encashment not allowed, it will be open to Respondent – 'Kiran Malhotra' to revive the application under Section 7."*

6. That the application bearing no. IA-4063(PB)/2020 filed by the Financial Creditor for the revival of the CP (IB) 1082(PB)/2018 based on the order dated 01.03.2019 passed by the Hon'ble Appellate Tribunal as the settlement was failed. In the hearing held on 01.10.2020, the Hon'ble NCLT, Principal Bench, New Delhi allowed the application for revival of the original application CP (IB) 1082(PB)/2018 and directed the IRP to resume his duties and continue until he is replaced by another Insolvency Professional.

7. That the order dated 01.10.2020 passed by the Hon'ble NCLT, Principal Bench, New Delhi received by the erstwhile IRP, Mr. Pramod Goel on 09.10.2020, accordingly he made general public announcement in the Financial Express, Jansatta in Delhi NCR & Chandigarh Edition and Daily Chardhikala (Punjabi) in Patiala edition on 12.10.2020 regarding the revival of the application CP(IB) No. 1082 (PB)/2018. The erstwhile IRP accordingly, constituted the CoC and filed the report dated 15.10.2020 under Regulation 13 & 17 of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016 before the Hon'ble NCLT, Principal Bench, New Delhi.

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8. That the Committee of Creditors in its first meeting held on 23.10.2020 approved the resolution for appointment of Mr. Devendra Singh, undersigned, having IBBI Registration No. IBBI/IPA-002/IP-N00001/2016-17/10001 to act as Resolution Professional in the matter. The Hon'ble NCLT, Principal Bench, New Delhi vide its order dated 24.11.2020 appointed Mr. Devendra Singh as Resolution Professional of Alchemist Township India Limited, Corporate Debtor.

9. That the copy of the order dated 24.11.2020 passed by the Hon'ble NCLT, Principal Bench, New Delhi was received on 03.12.2020 by the undersigned from the erstwhile IRP. The same was also available on the website of Hon'ble NCLT on 03.12.2020. That the RP published the General Public Announcement on 10.12.2020 in Business Standard, Hindi & English in all India edition intimating the public at large about the revival of CIRP against the Corporate Debtor with effect from 01.10.2020 and appointment of undersigned as Resolution Professional by the Hon'ble NCLT, Principal Bench, New Delhi. The Insolvency Commencement date in the matter is 25.01.2019.

10. The Resolution Professional filed the Second Progress Report on 28.12.2020, Third Progress Report on 27.02.2021, Fourth Progress Report on 18.05.2021 and Fifth Progress Report on 15.08.2021 before this Hon'ble Tribunal detailing the status and developments undertaken in the instant matter.



11. That the Resolution Professional sent the Notice of Fifth Meeting of Committee of Creditors ('CoC/Committee') alongwith agenda and Explanatory Statement to the members of CoC on 07.09.2021. The copy of Notice of Fifth meeting of CoC scheduled to be held on 11.09.2021 is enclosed herewith and marked as **ANNEXURE A-1**

12. That the Fifth meeting of Committee of Creditors was held on 11.09.2021 and in compliance with Regulation 24 (7) of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016, the undersigned circulated the minutes of Fifth Meeting of CoC on 13.09.2021. The copy of Minutes of the Fifth meeting of CoC is enclosed herewith and marked as **ANNEXURE A-2**

13. That pursuant to convening the Fifth meeting of CoC on 11.09.2021, keeping in mind, the large number of Stakeholders involved, the SMS based e-voting portal was set up for which voting lines were opened from Wednesday, 15th September 2021 at 09:00 AM to Monday 20th September 2021 at 11:00 AM for Financial Creditors in a Class and from Monday 20th September 2021 at 11:30 AM till 11:30AM on 21.09.2021 for Financial Creditors and Authorized Representative. Subsequently after concluding the voting by the CoC, the Resolution Professional in compliance with Regulation 26 (5) of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016, circulated the summary records of e-voting on 22.09.2021. The copy of summary records of E voting regarding fifth meeting of CoC is enclosed herewith and marked as **ANNEXURE A-3**.

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14. That the CoC in its Fifth Meeting held on 11.09.2021, wherein several matters and issues were discussed and voted upon including revised Eligibility Criteria under section 25(2)(H) of IBC, 2016, for fixing the eligibility criteria of Prospective Resolution Applicants ("PRAs") who would be interested in submission of Resolution Plan in the CIRP of Corporate Debtor. The CoC approved the Eligibility Criteria and accordingly, in compliance with the provisions of Regulation 36(A) of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016, the undersigned published Form – G on 23.09.2021. Accordingly, RP published Form-G on 23.09.2021 for inviting Expression of Interest ("EOI") from Prospective Resolution Applicants for submission of Resolution Plan in the Insolvency Resolution of the Corporate Debtor. In response to the publication of Form-G on 23.09.2021 in Business Standard (English + Hindi), all Editions & Financial Express (English) & Jansatta (Hindi), All edition.

The relevant Timeline in the insolvency resolution of the corporate debtor are as under:-

| **RELEVANT DATES IN THE INSOLVENCY RESOLUTION OF THE CORPORATE DEBTOR** | | |
|---|---|---|
| 1. | Date of invitation of expression of interest | 23.09.2021 |
| 2. | Last date for receipt of expression of interest | 23.10.2021 |
| 3. | Date of issue of provisional list of prospective resolution applicants | 02.11.2021 |
| 4. | Last date for submission of objections to provisional list | 07.11.2021 |
| 5. | Date of issue of final list of prospective resolution applicants | 17.11.2021 |
| 6. | Date of issue of information memorandum, evaluation matrix and request for resolution plans to prospective resolution applicants | 07.11.2021 |
| 7. | Last date for submission of resolution plans | 07.12.2021 |



The copy of Form-G published on 23.09.2021 in Business Standard (English + Hindi), all Editions & Financial Express (English) & Jansatta (Hindi), All edition are enclosed and marked as **ANNEXURE A-4.**

15. That the application filed by Master Vision Surveyors Private Limited (a Financial Creditor of the Corporate Debtor – Related Party) against their reclassification as Related Party having IA no. 2297/2021, which was listed for hearing on 06.09.2021. Wherein time was granted to file the rejoinder by the Hon'ble NCLT, New Delhi Bench. In the next date of hearing which was held on 11.10.2021, due to paucity of time the matter was could not be heard and listed for further proceeding on 24.11.2021.

16. That in the hearing held on 27.07.2021 before the Hon'ble NCLT, New Delhi, wherein the Hon'ble tribunal advised the RP to move an appropriate application to PMLA. Accordingly, RP filed an application before the PMLA, Special Court which was not accepted and the Registrar of PMLA, Special Court directed to send request letter for obtaining the copy of the application alongwith the documents as seized by the ED in the search conducted on 19.09.2019. The Resolution Professional sent a Request letter on 08.10.2021 to Registrar Office, PMLA, Special Court for the issuance of certified copy of Original Application No. 356 of 2019 alongwith the documents seized by ED on 19.09.2019. So far no document have been received by the RP. The order passed by the Hon'ble NCLT, New Delhi Bench on 27.07.2021 is reproduced hereunder:



***"This is an application filed by the RP under Section 19(2) of the Code, seeking to have the copies of the documents which are seized by the PMLA authorities under search and seizure operation. The contention of the RP is that they are very relevant for the purpose of CIRP and the same cane be provided to them at the earliest point of time, whereas the counsel for the PMLA authorities represents that voluminous record are available with them and the same is produced before the Special Judge as part of its evidence and it is a very big scam running into crores of rupees. Further they submit the investigation is still on and if at all the RP is really interested in taking the copies, an application under Section 8 of the PMLA Act can be made before the Special Judge for PMLA and the same can be obtained. Counsel for the RP further submits that if at all this court directs the RP to file a necessary application before the PMLA Special Judge, the same can be made. There is no permission required for the RP to approach the relevant authorities or any court of law for obtaining certified copies of the documents, it is well within his purview of duties and hence special permission is not required.***

***The RP is directed to make any application to the relevant authorities for the copies of the documents as required for the CIRP purposes.***

***Application stands disposed of."***

17. That the Resolution Professional filed an application on 18.08.2021 before the Hon'ble NCLT, New Delhi bearing I.A No. 3719 of 2021 in terms of Section 60(5) of the Insolvency and Bankruptcy Code, 2016 seeking exclusion of 168 days from CIRP period and as per the order passed by the Hon'ble NCLT, New Delhi in the hearing held on 25.08.2021, the period of 168 days exclusion was granted by the Hon'ble Adjudicating Authority. Now the CIRP after considering the order passed by Hon'ble NCLT on 03.02.2021 (Exclusion of 623 Days), 13.04.2021 (Extension of 90 Days), 19.07.2021 (Exclusion of 48 Days) & 25.08.2021 (Exclusion of 168 Days), shall ends on 07.02.2022. Copy of the Order dated 03.02.2021, 13.04.2021, 19.07.2021 & 25.08.2021 are annexed and marked as **ANNEXURE – A5 (Colly).**

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18. That an application having IB no. 103/74(3)/ND/2019, titled Kusum Lata and Ors. Versus Alchemist Township India Limited was listed for hearing on 02.08.2021 before Hon'ble NCLT, New Delhi, Bench- II, wherein the Hon'ble Tribunal disposed off the said application. The order passed by the Hon'ble Adjudicating Authority is reproduced hereunder:

> ***"None appeared for the petitioner, RP appears in person as well as through his counsel. We further notice that on the last date too i.e. on 22nd March 2021, none appeared for the petitioner.***
>
> ***In the course of hearing, the RP informs that out of 100 peritioners, one Mr. Badrinath at Sr. No.25 of the Memo of Parties have already submitted his claim but others have not submitted their claim. We further notice that the Petitioners in para 4 of the Petition have stated the amount of deposit, date of deposit, date of maturity and the maturity amount. We also find that a copy of this petition has already been served on the RP.***
>
> ***Therefore, considering the above facts and since the Petitioners are the depositors, we direct the RP to examine the claims as referred to in Para 4 of the petition. If the RP needs further information, he may inform the petitioner concerned by all modes including through publication in the local newspaper one in "Hindi" and one is "English" circulated within the area, where the Petitioner reside.***
>
> ***The Petitioners herein are also directed to file their claims before the RP within a month from today alongwith the supporting documents.***
>
> ***With this, the petition stands disposed off."***

19. That accordingly, the RP made public announcement in compliance with the order of Hon'ble NCLT, New Delhi dated 02.08.2021 in Business Standard (English), Lucknow Edition, Rashtriya Sahara & Aj (Hindi), Kanpur Edition on 14.08.2021. The last for submission of claims was 02.09.2021. Copy of the Order of Hon'ble NCLT, New Delhi dated 02.08.2021 and Public Announcement dated 14.08.2021 are annexed and herewith marked as **ANNEXURE – A6 (Colly).**

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**REAGARDING THE STAKEHOLDERS CLAIMS**

20. That the RP received number of claims in Form CA from Financial Creditors in Class of the Corporate Debtor after public announcement on 14.08.2021. That till 17.09.2021, the RP received total 7,76,232 claims since Insolvency Commencement Date from Financial Creditors in a Class, out of 7,76,232 claims, the RP has admitted 5,63,361 claims and 55,000 claims are under verification. The brief status of remaining 1,57,871 is produced hereunder:

| S. No. | Particulars | No. of Claims |
|---|---|---|
| 1. | Duplicate Claims | 93,557 |
| 2. | Rejected (Belongs to other than Corporate Debtor) | 22,145 |
| 3. | Pending for further verification | 42,169 |
| | **TOTAL** | **1,57,871** |

Due to voluminous claim data being received on daily basis, the verification and updation of claim is a rigorous and dynamic process. Resolution Professional is verifying the list on regular basis and subsequent data/ list shall be updated and will be placed and filed before this Hon'ble Tribunal on regular basis.

21. That it is pertinent to note that the Financial Creditors in a Class as observed by RP belongs to very poor class as labourers, farmers, vegetable vendors, shopkeepers and they are not educated fraternity of the society. They are filing their claims through intermediaries such as agents etc and huge number of claims are being sent through common email Ids. It was also found by the RP that although these Financial Creditors in a Class are so called Homebuyers category but alongwith their claims in Form CA they are enclosing the proof of their claims as their KYC documents and acknowledgement for their application where certain details are mentioned such as date of application, relevant period, date of cessation of offer and refund amount etc. It was communicated to the stakeholders by the undersigned that keeping in view bulk data and

communications being received, each and every stakeholder was requested to generate their unique email account and to provide mobile number in order to be a part of the vote casing process through which crucial decisions in the CIRP of Alchemist Township India Limited will be taken and required to be approved by committee. Further it was also communicated to the stakeholders that in absence to the same, the RP will not be in position to conduct a hassle free voting of the stakeholders as by using a single email account for various stakeholders may lead to unfair voting practice.

22. It is further stated that the undersigned has till 17.09.2021 has verified and circulated the list of creditors as per the details stated below :

| Date | Total Folder Downloaded from Emails (Nos.) | Rejected as belongs to Entities other than CD (Nos.) | Received in Duplicate (Nos.) | Pending for Further Verification (Nos.) | After verification admitted and Uploaded on Website (Nos.) | Amount Claimed (Rs.) | Amount Admitted (Rs.) | Principal Amount (Rs.) | Interest Amount (Rs.) | List No |
|---|---|---|---|---|---|---|---|---|---|---|
| | 5 | - | - | - | 5 | 2,275,701 | 2,025,000 | 2,025,000 | - | List IRP |
| 30-01-21 | 12,833 | - | - | 2,438 | 10,395 | 1,268,072,958 | 744,490,232 | 446,694,139 | 297,796,093 | List 1 |
| 10-02-21 | 12,832 | 743 | 141 | 56 | 11,892 | 1,252,295,674 | 599,385,917 | 385,398,823 | 213,987,094 | List 2 |
| 21-02-21 | 15,363 | 65 | 930 | 2,978 | 11,390 | 1,241,295,350 | 535,451,145 | 306,445,262 | 229,005,882 | List 3 |
| 28-02-21 | 25,856 | 941 | 3,006 | 1,475 | 20,434 | 2,148,546,755 | 962,684,944 | 621,973,577 | 340,711,368 | List 4 |
| 10-03-21 | 38,395 | 802 | 4,939 | 718 | 15,766 | 1,583,158,000 | 672,291,802 | 471,650,671 | 200,641,131 | List 5 |
| | | - | 1,090 | 236 | 14,844 | 1,610,332,242 | 727,698,846 | 433,294,992 | 294,403,855 | List 6 |
| 20-03-21 | 53,213 | 825 | 3,304 | 1,376 | 10,005 | 1,116,547,778 | 507,220,699 | 306,732,377 | 200,488,322 | List 7 |
| | | - | 1,017 | 338 | 11,212 | 1,126,831,908 | 491,470,864 | 286,270,208 | 205,200,656 | List 8 |
| | | - | 1,015 | 236 | 11,321 | 1,156,380,880 | 465,418,624 | 282,047,002 | 183,371,622 | List 9 |
| | | 327 | 742 | 2,753 | 8,742 | 969,400,723 | 351,854,380 | 272,901,777 | 78,952,603 | List 10 |
| 31-03-21 | 67,107 | 421 | 3,162 | 744 | 11,163 | 1,210,157,821 | 458,536,082 | 296,882,686 | 161,653,396 | List 11 |
| | | 538 | 1,091 | 680 | 10,591 | 1,148,257,815 | 480,098,156 | 311,590,103 | 168,508,053 | List 12 |
| | | 354 | 1,126 | 414 | 11,006 | 1,120,405,473 | 454,044,560 | 290,750,867 | 163,293,693 | List 13 |
| | | 386 | 780 | 338 | 11,396 | 1,163,156,228 | 484,461,733 | 316,160,738 | 168,300,994 | List 14 |
| | | 718 | 767 | 1,698 | 9,734 | 999,418,149 | 425,614,452 | 281,079,577 | 144,534,876 | List 15 |
| 17-04-21 | 76,752 | - | 4,546 | 231 | 11,978 | 1,232,394,586 | 479,458,493 | 319,603,016 | 159,855,476 | List 16 |
| | | 2 | 1,945 | 415 | 17,637 | 1,883,620,569 | 734,006,355 | 469,102,915 | 264,903,440 | List 17 |

DEVENDRA SINGH * INSOLVENCY PROFESSIONAL * IBBI/IPA-002/IP-N000011/2016-17/10001

| Date | Total Folder Downloaded from Emails (Nos.) | Rejected as belongs to Entities other than CD (Nos.) | Received in Duplicate (Nos.) | Pending for Further Verification (Nos.) | After verification admitted and Uploaded on Website (Nos.) | Amount Claimed (Rs.) | Amount Admitted (Rs.) | Principal Amount (Rs.) | Interest Amount (Rs.) | List No |
|---|---|---|---|---|---|---|---|---|---|---|
| | | - | 1,286 | 340 | 11,874 | 1,270,661,060 | 471,339,128 | 321,998,168 | 149,340,959 | List 18 |
| | | 1,030 | 828 | 3,116 | 8,525 | 915,075,468 | 376,906,271 | 239,376,761 | 137,529,510 | List 19 |
| | | 1,865 | 1,113 | 246 | 9,775 | 1,152,056,208 | 484,081,716 | 305,772,299 | 178,309,417 | List 20 |
| 23-04-21 | 93,461 | 491 | 5,424 | 903 | 12,218 | 1,292,050,207 | 537,563,498 | 347,179,087 | 190,384,411 | List 21 |
| | | 551 | 860 | 754 | 12,835 | 1,328,467,160 | 534,082,238 | 353,266,588 | 180,815,650 | List 22 |
| | | 546 | 961 | 798 | 12,695 | 1,329,677,780 | 558,608,204 | 366,333,015 | 192,275,189 | List 23 |
| | | 569 | 1,450 | 1,891 | 10,517 | 1,080,694,513 | 477,557,695 | 310,979,316 | 166,578,379 | List 24 |
| | | 578 | 1,033 | 1,245 | 12,143 | 1,273,663,830 | 483,575,921 | 310,196,195 | 173,379,726 | List 25 |
| | | 549 | 1,296 | 863 | 12,291 | 1,355,287,532 | 558,801,071 | 353,917,174 | 204,883,897 | List 26 |
| 02-05-21 | 97,125 | 565 | 6,178 | 775 | 12,130 | 1,290,281,060 | 523,184,530 | 343,848,604 | 179,335,926 | List 27 |
| | | 468 | 1,200 | 843 | 12,489 | 1,243,579,537 | 492,129,838 | 318,928,660 | 173,201,178 | List 28 |
| | | 578 | 1,254 | 719 | 12,449 | 1,349,515,598 | 513,768,361 | 330,411,686 | 183,356,674 | List 29 |
| | | 529 | 1,212 | 759 | 12,500 | 1,355,937,859 | 551,898,367 | 367,089,394 | 184,808,973 | List 30 |
| | | 575 | 2,063 | 852 | 11,509 | 1,198,185,376 | 495,979,136 | 318,646,536 | 177,332,600 | List 31 |
| | | 571 | 2,604 | 822 | 13,481 | 1,481,810,981 | 602,034,853 | 396,986,113 | 205,048,740 | List 32 |
| 12-05-21 | 82,500 | 434 | 4,613 | 917 | 12,604 | 1,398,408,798 | 606,572,585 | 395,331,027 | 211,241,559 | List 33 |
| | | 539 | 2,206 | 865 | 11,390 | 1,184,042,078 | 500,384,547 | 323,509,928 | 176,874,619 | List 34 |
| | | 605 | 1,886 | 824 | 11,685 | 1,142,625,950 | 476,696,680 | 314,139,192 | 162,557,488 | List 35 |
| | | 499 | 2,310 | 827 | 11,364 | 1,233,517,404 | 460,613,137 | 294,594,943 | 166,018,194 | List 36 |
| | | 561 | 2,383 | 940 | 15,048 | 1,645,644,219 | 660,917,530 | 437,713,218 | 223,204,312 | List 37 |
| 26-05-21 | 48,482 | 438 | 3,675 | 689 | 12,089 | 1,294,617,129 | 556,622,355 | 364,474,125 | 192,148,230 | List 38 |
| | | 536 | 2,343 | 646 | 11,475 | 1,249,926,589 | 497,288,673 | 320,444,746 | 176,843,927 | List 39 |
| | | 523 | 2,223 | 1,052 | 12,793 | 1,270,469,812 | 532,760,941 | 351,113,475 | 181,647,466 | List 40 |
| 01-06-21 | 22,776 | 693 | 4,255 | 1,117 | 16,711 | 1,734,731,865 | 790,486,171 | 524,096,420 | 266,389,751 | List 41 |
| 15-06-21 | 23,714 | 1,018 | 4,690 | 943 | 17,063 | 1,823,617,362 | 791,603,143 | 516,507,422 | 275,095,721 | List 42 |
| 02-07-21 | 13,312 | 489 | 1,993 | 496 | 10,334 | 1,111,815,924 | 542,454,906 | 382,127,490 | 160,327,415 | List 43 |
| 13-07-21 | 11,906 | 223 | 2,617 | 803 | 8,263 | 873,377,604 | 428,931,994 | 303,407,455 | 125,524,539 | List 44 |
| 04-09-21 | 36,222 | - | - | - | 11,222 | 3,38,30,13,192 | 58,88,65,275 | 36,94,61,380 | 21,94,03,896 | List 45 |
| 17-09-21 | 44,378 | - | - | - | 14,378 | 4,46,00,33,064 | 81,76,47,215 | 61,79,45,987 | 19,97,01,227 | List 46 |
| **Total** | **7,76,232** | **22,145** | **93,557** | **42,169** | **5,63,361** | **6495,53,33,771** | **2549,05,66,263** | **16,60,04,00,135** | **8,88,91,68,127** | - |



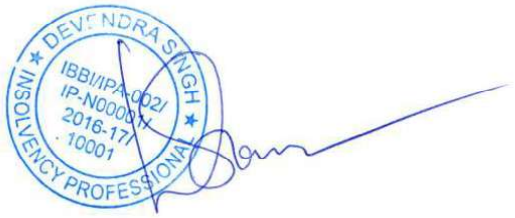
23. Further, the undersigned engaged an eight step process for verification of such vast number of claims. The said process is being produced hereunder:

**Process involved since receipt of email till upload of verified claim on the website:**

- **Step 1** - Receipt of e-mail from stakeholders for submission of Claim.
- **Step 2** - Acknowledgment of claim submitted by creditor, downloading claim documents and creation of folders.
- **Step 3** - Extraction of data received from Team-1 and recording the details in specified excel spreadsheet.
- **Step 4** - Analysis/ evaluation for accuracy by quality management team for data punched by Team.
- **Step 5** - Collation/finalization and compilation of data in final spread sheet eliminating possible errors.
- **Step 6** - Perusal of data by Resolution Professional for verification of claims.
- **Step 7** - Verification of claims by Resolution Professional
- **Step 8** - Upload /circulation of list of creditors by Resolution Professional

24. **BRIEF NOTE ON CLAIM VERIFICATION METHODOLOGY AND ADMISSION THEREOF ADOPTED BY RESOLUTION PROFESSIONAL IN THE MATTER**

- After the receipt of order dated 24.11.2020 passed by Hon'ble NCLT, Principal Bench, New Delhi, for the appointment of Resolution Professional in C.P. NO. (IB)-1082(PB)/2018, the copy of the order was received by the undersigned on 03.12.2020. A designated E-mail account was created particularly for the CIRP of the instant matter. The undersigned made the general public announcement on 10.12.2020 in Business Standard all edition (Hindi & English) and Daily Chardhi-Kala, Patiala Edition in Punjab.



- The undersigned after verification admitted the claims on regular basis and reconstituted the CoC on 18.12.2020, 28.02.2021, 18.05.2021 and 20.07.2021 accordingly. The updated list of creditors in compliance with Regulation 13 read with 14 of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016, was filed before the Hon'ble NCLT, Principal Bench, New Delhi accordingly and the report for reconstitution of COC in compliance with Regulation 17 of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016 was also filed before the Hon'ble NCLT, Principal Bench, New Delhi accordingly. Thereafter second, third and fourth CoC meetings were convened by RP.

- After the General Public Announcement which was published on 10.12.2020, gradually the number of mails started increasing which at certain point of time the number of emails crossed over 10,000 on per day basis. As of now, still the undersigned is in receipt of over 400 mails per day.

- The RP gradually realised that the stakeholders involved in the matter belongs to various states of the country such as Bihar, UP, Orissa, West Bengal, Andhra Pradesh, Maharashtra, Assam etc. On perusal of documents of claim it was also found that the financial creditors in a class (stakeholders) have only one document i.e. the receipt for the money paid by them to the Corporate Debtor in which certain information were captured such as Name of the Applicant, tenure of investment, Application Number, Customer ID, Maturity Amount and Maturity Date etc.

- Alongwith the Form CA, financial creditors in a class (stakeholders) attach the receipt as mentioned above and their KYC documents. The undersigned neither had any knowledge about the number of stakeholders in the matter nor did the Corporate Debtor provide any information about the stakeholders so far. The Corporate Debtor further claimed that the entire record pertaining to stakeholders were seized by the Enforcement Directorate in their search which was conducted on 19.09.2019. Meanwhile, the undersigned were in receipt of over 250-300 phone calls on daily basis which were extremely difficult to attend. That it is also pertinent to note that the financial creditors in a class as observed by the RP belongs to very

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poor class such as labourers, farmers, vegetable vendors, shopkeepers and the majority of them are not from educated fraternity. They are filing their claims through intermediaries such as agents and CSC etc. and large number of claims is being sent through common email ID's.

- For submission of claims by the stakeholders, an email id (cirp.atil@gmail.com) was created by the RP. As the information was disseminated via public announcements, the number of emails started increasing at an exponential pace.

  - ***Problem Faced:***

    For a long duration, about 10,000 emails were being received on a daily basis. On researching it was found that there is a certain limit on email server as well beyond which emails cannot be received in a single day. So in reality, emails upwards of 10,000 were being sent by the stakeholders but they were being delivered slow due to heavy congestion in the network.

    The data entry process (explained later) also slowed as there is a limit to downloading and uploading from/on gmail as well. Due to immense dataflow, the upper bandwidth limit for downloading was being hit constantly multiple times in a day which would then block the email, resulting delay in data entry process. The download bandwidth for gmail is 750 megabytes per hour and 1250 megabytes per day, exceeding usage beyond limits results in blocking of email. Average attachment size of a claimant's mail is about 5 megabytes which would mean the maximum files which can be downloaded would be between the ranges of 150-250 from one email ID. The blocking time would range from 12 to 24 hours. Multiple blocks in a short span of time would permanently block the email. In case of a permanent block, the email and all its content would become irrecoverable.

  - ***Solution implemented:***

    To handle the increased flow of emails, a domain named ATIL INSOLVENCY was created and the existing email ID was ported to the said domain (cirp.atil@atilinsolvency.com). Even after the creation of this domain ID did not solve the problem in its entirety.

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- Keeping in view the large number of stakeholders involved in the matter and in order to effectively handle their data and grievances, it was decided to set up helpline (Call Centre) and **"Stakeholders Data Management Cell"**, an EOI was circulated on 29.12.2020 for the establishment and appointment of Stakeholders Data Management Cell which can facilitate the process of collation of claims data. After receipt of EOIs, the undersigned established and created **"Stakeholders Data Management Cell"** on 07.01.2021 wherein the scope of work was elaborately defined which consists starting of helpline numbers and data collation team.

- After the establishment of **"Stakeholders Data Management Cell"** the undersigned further published the general public announcement on 16.01.2021 wherein the stakeholders were intimated about the website and help line numbers.

**STEPS TAKEN BY STAKEHOLDERS' DATA MANAGEMENT CELL**

A. **Help Line Centre:-** Five dedicated help line number were issued and circulated among the stakeholders by way of general public announcement on 16.01.2021.

B. **Email distribution system and handling of claims:**

a) The basic Gmail account created was unable to take the immense workload and hence, after consultation with Google support, it was decided to create a domain and migrate the mails to the new domain email.

b) A dedicated team were deployed to work on the email round the clock in shifts of 8 hours each. The work of this team was to download the attachments therein (claim documents), reply to the claimant (on behalf of the resolution professional), save a pdf of the conversation and then create a folder containing all the above mentioned documents, hereinafter referred to as "**folder creation**"



c) One team member was able to create about 250 folders in the span of 8 hours thereby indicating a rough estimate of 750 folders in the 24 hour window, implying reply was being sent to 750 emails on a daily basis.

d) Then the said mail also started getting blocked due to bandwidth limit. After consultation with IT professionals and Google support, it was brought to light that there is a certain limit as to the downloading capacity from Gmail as well as to that of sending replies in a day. The said download limit is 750MB in an hour and 1250MB in a day, exceeding which would lock the email for a timeframe which would range from an hour to 24 hours. Multiple blocks could have permanently blocked the email ID as well. At this point of time, emails were being received **upwards of 10,000 in a day**.

e) To resolve the issue of download-bandwidth, multiple channels/email IDs were created over a period of time. The use of these email IDs was to allow multiple team members to work on data entry at the same time. This would thereby multiply the download-bandwidth as well. Emails from the domain mail (cirp.atil@atilinsolvency.com) were being forwarded to these email IDs. Dedicated responsibility was assigned to a team member of Stakeholder Data Management Cell (operated by Alive Sourcing) whose duty was to keep changing the email IDs after every few hours so that a backlog could not created on one single email. By adopting this method the problem was resolved to large extent and then the work could be expedited. The undersigned could process over 700,000 emails till date. Numerous hours of discussion was held with the Google support team as and when problems were faced. The transcript of entire conversations with the Google support team is available on the email. About 25 such emails were further created and were assigned to multiple team members thereby ensuring round the clock data entry work to catchup with the increasing number of emails being received. To handle the large volume of data and multiple emails, a huge team was deployed whose strength in number was dynamic and was increased/decreased as per the volume of the work. Email IDs created are as below:



Team.one@atilinsolvency.com
Team.two@atilinsolvency.com
Team.three@atilinsolvency.com
Team4@atilinsolvency.com
Team5@atilinsolvency.com
Team6@atilinsolvency.com
Team7@atilinsolvency.com
Team8@atilinsolvency.com
Team9@atilinsolvency.com
Team10@atilinsolvency.com
Team11@atilinsolvency.com
Team12@atilinsolvency.com
Team13@atilinsolvency.com
Team14@atilinsolvency.com
Team15@atilinsolvency.com
Team16@atilinsolvency.com
Team17@atilinsolvency.com
Team18@atilinsolvency.com
Team19@atilinsolvency.com
Team20@atilinsolvency.com
Team21@atilinsolvency.com
Team22@atilinsolvency.com
Team23@atilinsolvency.com
Team24@atilinsolvency.com
Team25@atilinsolvency.com
Team26@atilinsolvency.com

f) **It is to be noted that the above-mentioned email IDs were created only** for **internal use and are not intended to be circulated to the stakeholders.** To handle the grievances of stakeholders and to guide them on the claim filing procedure, a dedicated call center was also setup and a dedicated email ID (helplineatil@gmail.com) was created. The contact numbers for the same was communicated to the stakeholders via website and email correspondences.

g) This have solved the problems such as

   i. multiple teams could be deployed,
   ii. admin email would not get blocked and
   iii. a larger number of claimants could be addressed to in a single day. 25 such users were created in a phased manner.

h) Further, two teams were created, namely, 'folder creation team' (whose scope of work was to send replies to the claimants and create folders of their documents) and 'data entry team' (whose scope of work was to enter the data from the claim documents in the pre-defined excel template developed by RP).



i) From the domain mail, email auto forwarding system was applied to multiple users in order to distribute the workload. It was observed that average attachment size was about 5MB. These forwarded emails (in the user ID) were then further sub-divided into folders of 300 mails each keeping in mind the daily download limit of 750MB in an hour and 1250MB in a day. Users were clearly instructed to not work on more than one folder in a window of 24 hours. To great extent, this resolved the issue of breaching the download limit.

j) An approximate of 25 users meant 7500 emails (300 emails each day) were being replied to and being created folders thereof. This meant approximate **300 man-hours** every day for folder creation team. This resolved the issue of *new emails* being backlogged.

k) The folders thus created by the team were then uploaded on the same day on to their respective Google drives. A person was dedicated to ensure a smooth working/ reconciliation and to keep a detailed record of folders created and uploaded.

**DATA ENTRY WORKFLOW AND PROCESS**

a) On receiving an email from the stakeholder, their data is downloaded and saved in their respective named folder. The said folder contains the documents sent by the stakeholder namely KYC documents, Form CA, Maturity Certificates and Other PDF files of their email along with the RP's acknowledgement of receipt of claim and other relevant documents (if any). The data so downloaded is then entered into an excel format prescribed by the RP which contains all relevant details from the submitted claim documents such as application number, customer ID, name of the creditor, date of investment, maturity date, claim amount, maturity amount, name of authorized representative and so on. In the same entry, file path is also mentioned to make it easier to track the entry and examine.

b) On completion of data entry by team members, their files are merged into one excel workbook and then random sampling is performed. Random sampling is done on the data wherein the details entered by the team member are checked in their entirety. If any mistakes or discrepancies are found, they are corrected and further in-depth verification of their work is performed. Due to such voluminous data work, a certain percentage of human error is always assumed.



c) After completion of the verification stage, several checks and calculations are performed as per the instructions from the RP. These include segregating the claims which do not pertain to the corporate debtor etc. When the data is set in the prescribed format, duplicate entries are searched within the file as a claimant, on occasion, sends multiple emails within a short span of time with the same information and documents. The duplicate (or reoccurring) data entries are then removed before finally submitting the file to the RP's team for final verification and submission of claims.

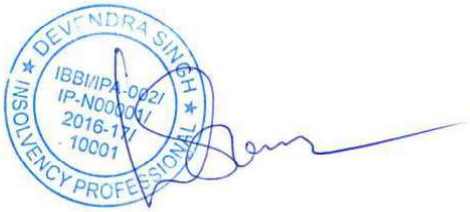
d) After thoroughly observing the claim documents an excel template containing around 20 columns were created. Instructions were disseminated to the team to follow the template strictly without fail.

e) For sampling and understanding purposes, a team of data entry was given different number of folders to record their speed and accuracy. It was observed that on an average a team member was able to work on no more than 100 folders in a day (10-12 hours). It is to be kept in mind that the claim documents received are not all in good condition, some are received as PDFs, some are received as pictures and some are received half scanned or poorly scanned.

f) A team of about another 30 people was made whose scope of work was to enter the data from the claim documents (Folder) in the excel template provided and submit on a daily basis with the utmost accuracy. This meant approximate **360 man-hours** every day for data entry team.

g) A person was dedicated to keep a record of folders distribution to the data entry team and to ensure timely submission thereof.

h) It is to be noted that more than 50% of the emails have more than one claim bond of a single claimant. Thereby increasing the time spent on one folder (read 'claimant'). Also note that time is invested in understanding the figures and details mentioned in the Form CA.



**QUALITY / ACCURACY CONTROL OF UPLOADED DATA**

i. A separate team was set up to work on the data entered by the data entry team (hereinafter referred as 'quality check team').

ii. On submission of excel by the data entry team, it is then passed on to quality control team where random sampling is done. Keeping in mind the volume of data, a random sampling of around is done. The team member shortlists the data to be checked and then opens their individual folders to check the accuracy. If any deviation is found, the same is communicated to the data entry team and corrections made instantly and accordingly. Claims with larger maturity amounts are especially checked to ensure no typing errors are made. Remarks were streamlined to keep the entire data uniform and easy to review. Maturity Certificates of other companies are marked accordingly.

iii. After observing the volume of data, it was decided to do closing after every 10 days. On the day of closing, entire data of that closing is merged, reviewed and finalized before submission to the Resolution Professional. Removal of duplicate entries, uniformity of remarks and other such actions are taken at this stage. This process takes somewhere between 36-48 hours depending on the volume of data worked on in that particular closing's timeframe.

iv. The finalized file is then submitted to the resolution professional for further working which would enable the RP to verify the claims.

v. From folder creation to data entry, approximate **750 man-hours** are being spent on a daily basis (**not including** the man-hours spent on review process and information management process). It is to be noted that a proactive strategy is being applied and changes are made as and when need arises.

vi. The above mentioned process should **not** be considered as an exhaustive list but merely a broad outline of the entire workflow. Many man-hours are spent on brainstorming, strategy creation and finding solutions thereof.



**METHODOLOGY ADOPTED BY RP FOR VERIFICATION AND ADMISSION OF CLAIMS**

i. On receiving the data from the stakeholder data management cell, series of random sampling was done again to ensure correctness of data. Any deviation, if found, were informed to the Stakeholder Data Management Cell and rectifications were made accordingly.

ii. Following calculations were done to the finalized data in order to come to the amount of claim to be admitted. As no information was available from the company, this was the only possible solution to arrive at a calculation which would be similar for all claimants. The following headings can also be found in the excel files attached:

- ***25/01/19:*** number of days are calculated between the insolvency commencement date and the maturity date of the claimant's bond. Insolvency commencement date is taken as 25.01.2019

- ***Scheme:*** this pertains to the scheme under which the claimant has invested her money in. The various schemes of corporate debtor as obtained from their scheme documents are as below:

| Category | A | B | C | D | E |
|---|---|---|---|---|---|
| Development Tenure (Years) | 4 | 6 | 9 | 12 | 16 |
| Amount | 1000 | 1000 | 1000 | 1000 | 1000 |
| Expected Value After Development | 1500 | 2000 | 3000 | 5000 | 10000 |

iii. This has been calculated by deducting the maturity date from the application date and the difference being divided by 365 to arrive at the number of years or the scheme under which the money was invested in. This is a work of approximation as at various occasions some or the other information might not have been available.

- ***Years Overdue (from 25/01/19):*** this calculation is required to calculate the present value of the maturity amount. This acts as the time period in the said calculation.

- ***Rate:*** present value formula is used to find the exact rate to be applied to wrt the scheme the money was invested under.

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- ***Principal:*** this is the amount assumed to have been invested by the claimant. This amount has been calculated by using the maturity amount and the scheme under which the money was invested in by the claimant as this amount could not be ascertained from the bond or any other document.

- ***Interest:*** this is the interest accrued over the principal amount. Calculated by deducting the Principal from the Claim Admitted amount.

- ***Claim admitted:*** this is the amount of claim admitted by the RP. Calculated by using Present Value formula.

- The offer cessation date of the stakeholders which falls on or prior to 25.01.2019, the simple interest @ 8% per annum has been taken into account in compliance with Regulation 16(A)(7) of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulation, 2016, which states that "the voting share of a creditor in a class shall be in proportion to the financial debt which includes an interest at the rate of eight per cent per annum unless a different rate has been agreed to between the parties."

iv. After all the calculations are done, duplicates entries are filtered from previous lists and such entries are segregated. Claims which do not pertain to the corporate debtor are marked as rejected. On completion of all the said steps, the list is then uploaded on the website. The claims do not have complete information kept as pending for further processing.

v. The RP after receipt of data in excel format verify the claims after at random checking and admit the claims accordingly. The admitted claim list regularly uploaded on the website. The verification and admission of claims are subject to the following disclaimers:

a. That no access to the books of account and relevant financial data and record were made available to the Resolution Professional.

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Accordingly, the claims of creditors in a class in the quoted list have been admitted after verifying merely the calculations made on the basis of the documents provided by the Claimant.

b. Since no historical and financial record of claimant which was maintained in software, the access to the software is not made available to the Resolution Professional for necessary examination and verification of the Claims. The accounting software and the alleged software (Digital Data) on which stakeholder's record was maintained is claimed to be seized by the Enforcement Directorate, Delhi Zonal Office – I during the search conducted on 19.09.2019 under Section 17(1) of the Prevention of Money Laundering Act, 2002.

c. The Resolution Professional has already communicated to Enforcement Directorate on 11.12.2020 & 14.01.2021 requesting them to provide the relevant data. However the Enforcement Directorate has not acceded to the request of the Resolution Professional. Hence, the claim amounts are although admitted but the same is subject to change/ revision post receipt and reconciliation of the data from the concerned authority and Corporate Debtor.

d. The offer cessation date of the stakeholders which falls on or prior to 25.01.2019, the simple interest @ 8% per annum has been taken into account in compliance with Regulation 16(A)(7) of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulation, 2016, which states that "the voting share of a creditor in a class shall be in proportion to the financial debt which includes an interest at the rate of eight per cent per annum unless a different rate has been agreed to between the parties."

e. The offer cessation date of the stakeholders which falls after 25.01.2019, the present value of the amount as on 25.01.2019 has

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INSOLVENCY PROFESSIONAL

been calculated in proportion to the original terms entered between the stakeholders and the Corporate Debtor.

vi. It is pertinent to mention here that the undersigned is in receipt of claim documents of other entities also then Alchemist Township India Ltd. Claimants, such as Alchemist Infra Reality Ltd., Alchemist Holdings Ltd. etc. which were rejected.

25. That the Resolution Professional in the previous Progress report stated and apprised this Hon'ble Tribunal regarding an application filed by him, under Section 7 of IBC, 2016 for initiation of Corporate Insolvency Resolution Process in the matter of Technology Park Limited. It is further stated that the said application was listed for hearing on 17.09.2021, wherein the respondents were directed to file a reply and the matter to be listed on 12.10.2021. Due to paucity of time the matter could not be heard and the listed for further proceedings on 16.11.2021.




**DEVENDRA SINGH**
Resolution Professional
In the matter of Alchemist Township India Limited
Regn No. IBBI/IPA-002/IP-N00001/2016-17/10001
Add: Assotech Business Cresterra, Office No.216,
2nd Floor, Tower-1, Sector-135, Noida, Uttar Pradesh-201305
Email Id:-dev_singh2006@yahoo.com; cirp.atil@gmail.com;
Mob-9810331877, 9810339416

**PLACE: New Delhi**
**DATED: 19.10.2021**

26.

सत्यमेव जयते

# INDIA NON JUDICIAL

## Government of Uttar Pradesh

## e-Stamp

| | | |
|---|---|---|
| Certificate No. | : | IN-UP66117789847601T |
| Certificate Issued Date | : | 15-Sep-2021 01:00 PM |
| Account Reference | : | NEWIMPACC (SV)/ up14013904/ GAUTAMBUDDH NAGAR 1/ UP-GBN |
| Unique Doc. Reference | : | SUBIN-UPUP140139042121029286687T |
| Purchased by | : | DEVENDRA SINGH |
| Description of Document | : | Article 4 Affidavit |
| Property Description | : | UNIT NO 216, TOWER 1, ASSOTECH BUSINESS CRESTERRA, SECTOR 135, NOIDA |
| Consideration Price (Rs.) | : | |
| First Party | : | DEVENDRA SINGH |
| Second Party | : | Not Applicable |
| Stamp Duty Paid By | : | DEVENDRA SINGH |
| Stamp Duty Amount(Rs.) | : | 100 (One Hundred only) |

NOTARY PUBLIC Narendra Narayan Agnihotri Noida G.B. Nagar R.No-2320 NOTARIAL GOVT OF INDIA

Please write or type below this line

This is the integral part of the Affidavit.

NOTARY PUBLIC Narendra Narayan Agnihotri Noida G.B. Nagar R.No-2320 GOVT OF INDIA

Statutory Alert:

1. The authenticity of this Stamp certificate should be verified at 'www.shcilestamp.com' or using e-Stamp Mobile App of Stock Holding. Any discrepancy in the details on this Certificate and as available on the website / Mobile App renders it invalid.
2. The onus of checking the legitimacy is on the users of the certificate.
3. In case of any discrepancy please inform the Competent Authority.

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

**I.A. NO. _____ OF 2021**
**IN**
**C.P. NO. (IB)-1082(PB)/2018**

**IN THE MATTER OF:**

**ALCHEMIST TOWNSHIP INDIA LIMITED.**
FLAT NO- 1511 (Front Portion), Hemkunt Chambers,
89, Nehru Place, New Delhi 110019

**.....Corporate Debtor**

**AND IN THE MATTER OF:**

Devendra Singh

**..... Resolution Professional**

**AFFIDAVIT**

I, Devendra Singh, S/o. Late Shri Daryao Singh, aged about 57 years, having office at Assotech Business Cresterra, Office No. 216, 2nd Floor, Tower-1, Sector-135, NOIDA, Uttar Pradesh 201304 , do hereby solemnly affirm and declare as under:

1. That I am acting as Resolution Professional (RP) in the Corporate Insolvency Resolution Process (CIRP) of Alchemist Township India Limited (ATIL) "Corporate Debtor" pursuant to the order dated 24.11.2020 in C.P. NO.(IB)-1082(PB)/2019 passed by the Hon'ble National Company Law Tribunal ("NCLT") New Delhi, Principal Bench.
2. That I am filing the instant Sixth Progress Report for the consideration of the Hon'ble Adjudicating Authority.
3. That the facts stated above are based on the progress of the matter, till date, are true to best of my knowledge.

**DEPONENT**

**VERIFICATION**

I, the above named Deponent, do hereby state that the paragraphs 1 to 3 of instant affidavit are true and correct to my own knowledge. No part of it is false and nothing material is concealed therefrom.

Verified at Noida on this 19th day of October, 2021.

**DEPONENT**

NOTARY PUBLIC ★ GOVT OF INDIA ★ Narendra Narayan Agnihotri Noida G.B. Nagar U.P. R.No-2320

ATTESTED
Narendra Narayan Agnihotri
Advocate (Notary)
R.No-2320
Noida G.B.Nagar

19 OCT 2021