

***BALENDU SHEKHAR***

Advocate

even though my client has no nexus with any such incidents as alleged.

5. That the false allegations made by you intentionally and deliberately in public against my client are derogatory and defamatory. That the disparaging remark made and spoken by you against my client are false, concocted, malicious and incorrect. The disparaging remarks made by you publicly against my client have and will lower the dignity of my client and damage my client's reputation in the eyes of the public.

6. That your deliberate actions of making false and malicious allegations against my client in public clearly reveal your ulterior motive for demeaning and slandering the image of Shri Nitin Gadkari.

7. That the news circulated and published by you, the noticee, is per se defamatory and scandalous. Baseless conclusions have been drawn on your part.

8. You the noticee deliberately published the aforesaid 'List of India's Most Corrupt' mentioning the name of Mr. Nitin Gadkari in a grossly irresponsible manner. Mr. Nitin Gadkari is a senior party member at the helm of one of the largest political parties and commands the respect of the public at large. He has a large following. However, you the noticee, deliberately tried to malign his image even though he is not involved in any wrongful or corrupt act.

9. That the contents of your article carry massive ramifications for Bhartiya Janata Party. The reputation and image of senior leaders is vital for any political party. However, you the noticee deliberately and intentionally published the said news item knowing fully well and having reason to believe that such imputation will harm the reputation of Mr. Nitin Gadkari and Bhartiya Janata Party.

10. That wild and concocted allegations mentioned in the aforesaid news article by you the noticee against Mr. Nitin Gadkari made are completely defamatory, scandalous and false.

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