DHANANJAY JOSHI ASSOCIATES

ADVOCATES

2ND FLOOR, 18/4, SALEH CENTRE ANNEXE, CUNNINGHAM ROAD, BANGALORE 560 052

Ref. No. CC - 37

February 01, 2014

BY COURIER AND SPEED POST ACKNOWLEDGEMENT DUE

Shri. Arvind Kejriwal, C-II/23, Tilak Lane, New Delhi – 110 001.

also at:

902 R, Girnar Apartments, Kaushambi, Ghaziabad - 201010, Uttar Pradesh

Sir,

Re.: Defamatory allegations against Shri. Ananth Kumar.

We write to you for and on behalf of and under the instructions of our client, Shri. Ananth Kumar, residing at 26/1, H B Samaj Road, M N Krishna Rao Cross Road, Near Canara Bank, Basavanagudi, Bangalore – 560 004.

- Our Client is, presently, a Member of Parliament and has been a Member of Parliament for the past more than a decade. He is also a former union cabinet minister. Our Client is also amongst the senior General Secretaries of the Bharatiya Janata Party. Our client is a public figure and enjoys a clean and good reputation, demonstrated by the fact that he has been successfully elected to parliament without a break for the past five consecutive terms.
- 2. On 31.01.2014, in the course of a meeting of your Aam Aadmi Party, during which media persons were present, you stated that our Client is corrupt and that he has a criminal background.

DHANANJAY JOSHI ASSOCIATES ADVOCATES

CONTINUATION SHEET

- 3. The above statement has come to our Client's notice based on the newspaper reports and from friends and well-wishers. The above-mentioned defamatory allegations have also been reported widely in print and electronic media.
- 4. The said allegations are motivated, baseless and malicious and their publication is, clearly, defamatory in relation to our Client. Our Client denies that he is corrupt or has a criminal background, as alleged by you. It is relevant to note that you have failed to provide any shred of evidence to support your allegations. All allegations made by you are false to your knowledge and our Client denies them all.
- 5. Your allegations against our Client have been heard, read and seen across the country, thereby causing irreparable harm, loss and injury to our Client.
- 6. In the circumstances, we, on behalf of our Client, do hereby call upon you to, within a period of three days from the receipt of this Legal Notice, publish a suitable statement withdrawing all allegations against our Client and apologising to our Client for the immense loss, harm and injury caused to him due to your actions. The text of such statement shall be subject to our Client's prior approval. The said statement must be made available to our Client for publication through media of his choice.
- 7. You may note that, in the event of your failure to comply with the requisitions set out hereinabove, we are under instructions to initiate appropriate civil proceedings against you for compensation as well as appropriate criminal proceedings against you for libel and slander, for the costs and consequences of which you shall be responsible.

Yours truly,

DHANANJAY JOSHLASSOCIATES

ADVOCATES