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Date : 07-07-2023

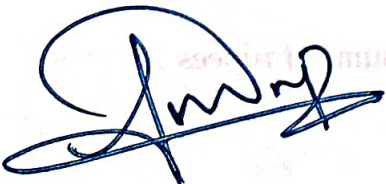
Ref.No : AK-271/2023

To,

1. Mr.M.N. Kumar  
"Sai Dutta Arcade",  
#2/1, 2nd floor, 5th Cross,  
2nd Main, Gandhinagar,  
Bangalore - 560 009  
Email: [nkumar\\_3336@yahoo.com](mailto:nkumar_3336@yahoo.com)  
Mobile: 988028336

2. Mr.M.N. Suresh  
No.632, 3rd Main, 3rd Cross,  
WOC Road, Mahalakshmpuram,  
Bangalore - 560 086  
Mobike: 9844842555

Under instructions from our Client Mr.Sudeep, resident of No. 359, 7<sup>th</sup> A Cross, 36<sup>th</sup> Main, J.P. Nagar 6<sup>th</sup> Phase, Bangalore 560 076, we hereby give you notice of the following:



1. Our Client is a film artist-actor, producer, director, philanthropist, social worker and above all regarded as a noble citizen and role model in the eyes of one and all. Having served the film industry for more than two decades, our Client has been hailed as one of the best talents in the film industry and in recognition of his works, he has been a recipient of several awards and accolades at state, national and international forums. He and his family members have maintained a tall and untarnished image and reputation not only in their professional lives but also in their social and religious circles. Infact, our client is praised by the production fraternity of the movie industry across this country for maintaining the highest standards of dignity, commitment and integrity. He has millions of admirers across the globe, who look upon him as a role model.

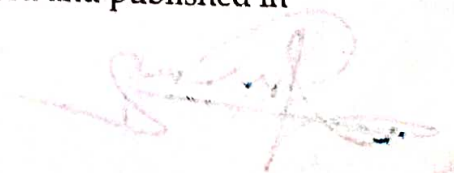
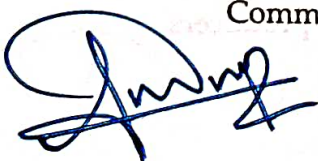
2. The first of you claiming yourself as a film producer and director expressed your willingness to produce a movie featuring our Client as a lead actor. Believing in the representations made by the first of you, our Client agreed and featured as an actor in movies titled "Ranga SSLC", "Kaashi from Village", "Mukunda Murari" and "Manikya".

3. Having taken undue advantage of the closeness and proximity that you shared with our Client, the first of you began making *per se* false, illegal and unsustainable claims against our Client for payment of huge sums of rupees



on the basis of events which were not only false but a figment of your own imagination. The first of you even addressed written communication to the Karnataka Film Chamber of Commerce setting out such illegal claims held out against our Client. Being aggrieved by your illegal and high-handed acts of issuing written communications containing false, illegal and *per se* defamatory allegations, our Client caused a legal notice dated 17-01-2023 issued to the first of you. The first of you is in due receipt of the said legal notice. Fearing any consequences that may befall upon you in the event of you continuing to pedal and circulate such *per se* illegal and defamatory claims, our Client had learnt that the first of you did not make a whisper of the same. Believing that good sense had dawned upon you, our Client did not proceed with initiating any legal action against the first of you which he had contemplated while causing the issuance of the said legal notice.

4. However, on 03-07-2023, to his utter shock, surprise and disgust, our Client was bombarded with calls and messages from his friends, family members and members of the movie fraternity questioning his integrity and professional ethics. Being keen to know as to why such doubts were raised, our Client was informed that the first and second of you in the company of certain other persons whose details are not known to him at this point of time had organised a press meet in the premises of the Karnataka Film Chamber of Commerce. In the said press meet, which has been recorded and published in



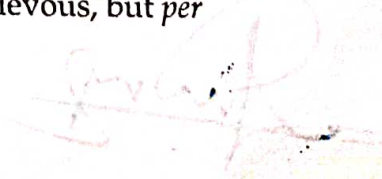
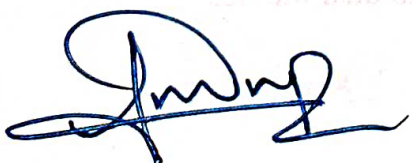
social media platforms such as YouTube & Facebook with the links-  
<https://fb.watch/IBgiiAkjaA/> ; [https://youtu.be/6\\_zZlj8ZKn8](https://youtu.be/6_zZlj8ZKn8) ;  
<https://youtu.be/g8tnhX0yzt0> ; <https://youtu.be/gskarMcOduU> ;  
<https://youtu.be/TxjAJZicR7g> as well as circulated in social networking  
platforms such as Whatsapp and Instagram, the first of you has alleged that  
our Client has taken certain amounts of monies as advance for working in a  
movie that you would be producing and that you had done a "full  
settlement" of payment in favour of our Client and further, that you had also  
advanced monies to various people on the basis of our Client's insistence and  
further, that you had advanced money to our Client to purchase a residential  
property at RR Nagar, Bangalore and further, despite having received the said  
amounts, our Client was avoiding either meeting the first of you or working  
in the movie that you would be producing among various other statements  
and further that our client has committed similar acts on two other producers  
and that the first of you had to pay money to them and further that our client  
has caused embarrassment and injustice to the first of you. The first of you is  
found to be making such statements upon the insistence and instigation given  
to you by the second of you. The second of you has even gone to the extent of  
stating that any other person who would be put in the place of the first of you,  
would have certainly committed suicide. You both have also held out a bold  
threat that in the event of our client not agreeing to work in the movie that the  
first of you would be producing, you and all your companion producers



would stage a protest in front of our client's residence on the 6th of July 2023 or at any place where our client would go for shooting. Our client has also learnt of banners and posts created and circulated by you on the social messaging and networking platforms, raising a call to stage a protest in front of his residence on the said date.

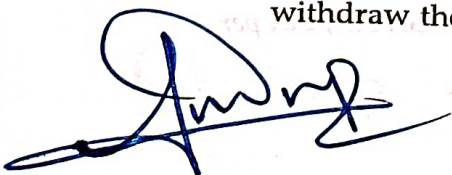
5. Further, the second of you have held out a bold threat against our Client by stating that the first of you had made attempts to commit suicide in the past and in the event he were to engage in any such attempts or has any adverse situations, our Client would be responsible for all such consequences that may befall upon the first of you's parents, wife and children due to your acts. The said statement made by the second of you has been recorded and widely circulated in the social media platforms such as Facebook, Whatsapp, and YouTube. You all have hatched a closely knit conspiracy in active collusion with certain other persons, whose details are not known to our client at this point of time, to systematically defame and dent his long built image and reputation and further annihilate his future prospects in the movie industry.

6. The aforementioned statements and allegations made by the both of you in the said press meet, which have been videographed, recorded, published and circulated in the print, visual media as well as social networking platforms such as YouTube, Facebook, Whatsapp are not only false, mischievous, but per



se defamatory and illegal. You have made the aforementioned statements and allegations knowing fully well that the same are not only false but far from the truth and made only with the *malafide* intention of defaming our Client and causing an irreparable dent on his long-built image and reputation with an ulterior motive of coercing him to give-in to the illegal demands of the first of you for payment of huge sums of rupees, which claims is *sans* any basis or justification whatsoever. Your *malafides* stand corroborated by the fact that you have intentionally chosen not to even whisper about the legal notice dated 17-01-2023 issued by our Client throughout the press meet which you had organised in the premises of the Karnataka Film Chamber of Commerce which event has been organised obviously by taking undue advantage and abusing the powers and position held by the both of you in the said organisation.

7. The statements and allegations made by you all have put our Client and his family members to untold mental agony. It has ruined his image in his professional, personal and social life. He has been deeply disturbed as his moral uprightness, character and conduct have become the topic of discussion amongst one and all known to him as well as his viewers and admirers across the nation. In fact, few of the producers in the film industry who had offered our Client to feature him in their movies have communicated their decision to withdraw their offer fearing the damage that would be caused to their movies



solely due to your illegal and *per se* defamatory statements and allegations. The mental agony to which our client is subjected to is unimaginable besides being incalculable. Though the damage caused to the image and reputation of our Client cannot be measured and compensated in terms of currency, our Client however restricts the same to a notional figure of Rs.10,00,00,000/- (Rupees Ten Crores only). You have made yourself to pay to our Client a sum of Rs.10,00,00,000/- (Rupees Ten Crores only) as damages.

8. From the course of your conduct in making the *per se* defamatory statements and allegations knowing and having reason to believe that the said statements and allegations are false and far from truth, you have committed a serious offence which is made penal under Section 500 of the Indian Penal Code. You have thus made yourselves liable to be secured, dealt with and punished in accordance with law.

Under the circumstances stated above, we have been instructed to demand of you which we hereby do that you should, within three (3) days of the receipt of this notice, tender to our Client an unconditional apology for having made the defamatory statements and allegations mentioned above and further, get the said apology published in the print and visual media while taking necessary steps to ensure that your statements which are recorded and published in the social media platforms such as YouTube and Facebook are deleted forthwith and further, also to




pay or remit to our Client the sum of Rs.10,00,00,000/- (Rupees Ten Crores only) for which he has become entitled to get from you by way of damages for the loss of reputation and mental agony to which he is subjected to consequent to your *per se* defamatory statements and allegations made before the media in the meet organised at the Karnataka Film Chamber of Commerce on the 3rd day of July 2023.

If you fail to comply with the above demands, our Client would be constrained to institute appropriate criminal proceedings against the both of you by filing an appropriate complaint before the jurisdictional Magistrate for an offence which is made penal under Sections 499 and 500 of the Indian Penal Code so that you both are secured, dealt with and punished and further also to institute such civil proceedings against you all for the recovery a modestly estimated damages of Rs.10,00,00,000/- (Rupees Ten Crores only) in addition to claiming compensation at the hands of the courts before which you be prosecuted at your own cost and peril.

The charges of this legal notice is Rs.50,000/- (Rupees Fifty Thousand only) which you are also liable to pay.



Mr.Sudeep



Ajay Kadkol  
ADVOCATE

Copy to:

- WhatsApp numbers bearing +91 988028336 and +91 9844842555
- Email address bearing [nkumar\\_3336@yahoo.com](mailto:nkumar_3336@yahoo.com)

For safe delivery and completeness of service.