

Office :
Chamber No. 207/G661, New Courts,
Lawyers Complex, Ludhiana. (Pb.) India

Resi. : G 2425 HIG., Urban Estate, Phase-II,
Dugri, Ludhiana - 141 013 (PB) India.



High Court :
Room No. 2, Punjab & Haryana,
High Court Bar Association
Office : # 3155, Sec. 69,
S.A.S. Nagar, Mohali (Punjab) INDIA.

Ref. No. :

B. P. SINGH GILL

Advocate (Punjab & Haryana High Court)

Dated :

REGD.A.D.

Dated: 21.7.2017

To

1.Lucky @ Jai Hind son of Hira Lal
Resident of H.No.14119, Street no.2,
Tibba Road, Near Samrala Chowk, Ludhiana.

2.Mukesh Thakur son of Not known
Resident ofr House no.14060, St.no.2,
Ram Nagar, Tibba Road, Near Samrala Chowk,
Ludhiana.

3.Bhrishtachar Virodhi Jagriti Abhyan,
C/o Lucky @ Jai Hind son of Hira Lal,
Resident of H.no.14119, Street no.2,
Tibba Road, Near Samrala Chowk, Ludhiana.

Sub: Legal Notice

Sir,

Under the instructions and on behalf of my client Sukhdev Singh son of Salvinder Singh resident of Hosue no.14047, Street no.2, Mohalla Tibba Road, Ludhiana, I hereby serve you with the following notice:-

- 1.That my client is a peace loving law abiding citizen and is serving as an Inspector in the Food and Supplies Department of Punjab Government and living at the given address, alongwith his other family members including his brother namely Amritpal Singh @ Vicky. Brother of my client is serving in a private company known as Paytm situated at Ludhiana.
- 2.That all of you addressees are indulging yourselves in unlawful and illegal activities in connivance with each other and have formed an

Office :
Chamber No. 207/G661, New Courts,
Lawyers Complex, Ludhiana. (Pb.) India

Resi. : G 2425 HIG., Urban Estate, Phase-II,
Dugri, Ludhiana - 141 013 (PB) India.



High Court :
Room No. 2, Punjab & Haryana,
High Court Bar Association
Office : # 3155, Sec. 69,
S.A.S. Nagar, Mohali (Punjab) INDIA.

Ref. No. :

B. P. SINGH GILL

Advocate (Punjab & Haryana High Court)

Dated : 21/7/17

illegal gang to extort money from innocent people by blackmailing them and by means of extortion.

3. That in order to give real shape to your nefarious designs you got one transaction conducted on the mobile phone of the brother of my client under the pretext that mobile phone of you addressee no.1 is not in order and its screen is not displaying properly. After completion of transaction from the mobile of Amritpal Singh @ Vicky (brother of my client) you started threatening him with dire consequences and even filed a false and frivolous complaint against him with the police. That my client being a Government employee and a respectable person agreed to resolve the matter and paid Rs.20,000/- to you addressee no.1 in the presence of you addressee no.2 as both of you pretended to be active member of addressee no.3. The receipt of the above said payment was acknowledged by you addressee no.1 and the same was endorsed by you addressee no.2 as an attesting witness in the presence of other marginal witnesses.

4. That both of you addressee no.1 and 2 promised to withdraw the false complaint filed by you against the brother of my client at the time of receiving the above said payment. But later on started demanding Rs.20,000/- more than from my client and his brother. However my client again became ready to satisfy your in genuine and illegal demand raised by you but this time he assured to make the payment of another Rs.20,000/- only when you will withdraw the complaint filed by you with the police. At this you started demanded Rs.One Lac from my client and his brother for withdrawing the complaint and you also threatened my client that you will eliminate the whole family of my client

Office :
Chamber No. 207/G661, New Courts,
Lawyers Complex, Ludhiana. (Pb.) India

Resi. : G 2425 HIG., Urban Estate, Phase-II,
Dugri, Ludhiana - 141 013 (PB) India.



High Court :
Room No. 2, Punjab & Haryana,
High Court Bar Association
Office : # 3155, Sec. 69,
S.A.S. Nagar, Mohali (Punjab) INDIA.

Ref. No. :

B. P. SINGH GILL

Advocate (Punjab & Haryana High Court)

Dated : 21/2/17

- or get them falsely implicated in some heinous crime. You addressee no.1 and 2 also threatened my client that you will not let my client serve peacefully and get him falsely implicated in some criminal case, if your demand is not fulfilled.
5. That all of you hatched a conspiracy to defame my client and his brother and his family. You all addressee prepared pamphlet containing defamatory words libel and slander and posted the same on the social media. The said leaflet/pamphlet was uploaded by you addressee no.2 from your mobile no.81463-61055 alleging the addressee no.1 as aggrieved party and is issued on behalf of addressee no.3. The said leaflet/pamphlet is containing highly amounts to libel Code and the provisions of Information and Technology Act under Heading of Cyber Crime.
6. That you procured the photographs of my client and his brother Amritpal Singh @ Vicky from their respective profiles on the social media and prepared the defamatory pamphlet under the name and style "Paytm lootney ka Ek Khatarnak Hathyar", against my client and his brother. You have got affixed the photographs of my client and his brother alongwith their mobile numbers by showing a narration by my client and his brother in the following manner:-

The Photograph of my client is affixed with his name and mobile number purported to be saying "Main Weh bhrisht inspector hun jis se poora mohalla darta hai, meri upri kamai ka satar mere prewar ke rehan sehan wa gaarhion ki chaka chond se patta chalta hai, "Mera bhai Amritpal Singh urf Vicky Paytm mein noukri karta hai or dhokha dhari karke Paytm grahkon key paise loot laita hai,"

Office :
Chamber No. 207/G661, New Courts,
Lawyers Complex, Ludhiana. (Pb.) India

Resi. : G 2425 HIG., Urban Estate, Phase-II,
Dugri, Ludhiana - 141 013 (PB) India.



High Court :
Room No. 2, Punjab & Haryana,
High Court Bar Association
Office : # 3155, Sec. 69,
S.A.S. Nagar, Mohali (Punjab) INDIA.

Ref. No. :

B. P. SINGH GILL

Advocate (Punjab & Haryana High Court)

Dated : 21/2/17

"mere bhai ne lucky urf Jaihind ko bhahut draya dhamkaya or jahan tak kaha ke main police commissioner ke saath baith kar daroo pita hun, mera koi kuch nahin begarh sakta, uylta tere upper hi parcha kar dunga, magar Lucky urf Jaihind nahin dara jis karan mujey uskey saath 40,000/- or bank statement ditey huey mamla raffa dapha karney ki baat karni parhi per mainey 20,000 rupey hi diye or bank statement nahin diya.

You have further affixed photograph of Amritpal Singh @ Vicky alongiwth his mobile number and printed defamatory material purported to be narration by him "Mera Bhai mohalley ka sarkari gunda hai, uski sheh par main khuley aam dadagiri weh dhokhadhari ka karya karta hoon, mainey Paytm ka agent honey ka fayda utha kar Lucky urf Jaihind ka paise loota tha magar mera koi kuch nahin bigarh sakta. You have alleged Amritpal Singh @ Vicky as culprit.

You further affixed photograph of addressee no.1 saying that "main he who peerhat hun jis key sath Amrtipal Singh urf Viccky ney Paytm Ke Jariey dhokhadhari ki" Lucky @ Jaihind Mobile No.7355427270. The pamphlet further contains the name of addressee no.3 Bhrishtachar Virodh Jagriti Abhyan www.bybja.com.

7. That all of you to further defame my client and tarnish his image in the society and cause social as well as economic and pecuniary loss and got delivered the leaflets/pamphlets through the News Paper vendors by putting the same in the newspapers and circulated the defamatory material in the whole vicinity and also to the departmental colleagues and relatives of my client. Since the distribution of the defamatory material and the leaflets and the pamphlets as narrated earlier my

Office :

Chamber No. 207/G661, New Courts,
Lawyers Complex, Ludhiana. (Pb.) India

Resi. : G 2425 HIG., Urban Estate, Phase-II,
Dugri, Ludhiana - 141 013 (PB) India.

**High Court :**

Room No. 2, Punjab & Haryana,
High Court Bar Association

Office : # 3155, Sec. 69,
S.A.S. Nagar, Mohali (Punjab) INDIA

Ref. No. :

B. P. SINGH GILL

Advocate (Punjab & Haryana High Court)

Dated : 21/2/17

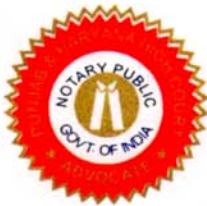
client and his family members are facing multifarious problems every where. The relatives and the friends of my client have started avoiding him. The Social Organizations and the religious congregation have also started shirking their relations with my client. The seniors and the colleagues of my client also deal him in an askance behaviour and my client has been suffering social as well as mental and financial loss and is forced to live a life of isolation. Not only this you addressee no.1 and 2 assaulted the sister of my client namely [REDACTED] Kaur when she was approaching towards her service near Ghanta Ghar Bridge with the intention to kill her and gave injuries with a sharp edged weapon. However a separate complaint has been filed by the sister of my client which is being dealt by the police and a criminal case has been registered against you addressee no.1 and 2 and some unidentified persons.

8. That criminal act committed by you against my client for defaming him and his family members is covered under the penal provisions of the Indian Penal Code and the provisions of Information and Technology Act, (Cyber Crime), for which you all are liable to be prosecution. A criminal case vide FIR NO.236 of 27.6.2017, U/s 384/420/511/500/120-B/34 IPC, P.S.Basti Jodhewal, Ludhiana has been registered against you addressee no.1 and 2. Apart from the physical, mental loss my client has suffered financial loss and all of you are jointly, individually and vicariously liable for the same. The loss occurred to my client is irreparable and beyond any compensation and cannot be compared with any pecuniary benefit any cannot be compensated with any monetary transaction. However my client has calculated the loss of physical, mental and social status on the



Office :
Chamber No. 207/G661, New Courts,
Lawyers Complex, Ludhiana. (Pb.) India

Resi. : G 2425 HIG., Urban Estate, Phase-II,
Dugri, Ludhiana - 141 013 (PB) India.



High Court :
Room No. 2, Punjab & Haryana,
High Court Bar Association
Office : # 3155, Sec. 69,
S.A.S. Nagar, Mohali (Punjab) INDIA

Ref. No. :

B. P. SINGH GILL

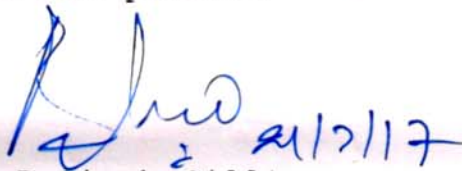
Advocate (Punjab & Haryana High Court)

Dated :

lower side to the tune of Rs.Fifty Lacs for which my client has every right to recover from you by adhering to the lawful and legal method.

I through this legal notice, hereby call upon you to pay Rs.Fifty Lac to my client as an amount of compensation for the act of defamation and conduct done by all of you, within fifteen days from the receipt of this notice failing which my client shall be at liberty to initiate appropriate proceedings, against all of you with the administrative authorities including the police and initiate civil as well as criminal proceedings against you at your costs risks and perils.

C.C.Retained in my office
For further action.


(B.P.Singh Gill)

Advocate.

