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al B Ganu
Manjiri S Ganu
M. Narsimha Reddy
TS. Praveen Kumar

GANU & CO.

Advocates

Ref. No. 11 119/8/2009

BY RPAD

Dt.21.8.2009

To

Sri Kishore Deshpande Advocate 4-3-324/1, II & III floors Bank Street, Koti, Hyderabad 500 095.

Sir,

Our clients M/s Mehta & Modi Homes represented by its partner Mr. Soham Modi have placed your notice dt. 13.6.2009 in our hands with instructions to issue the following reply.

At the outset it is submitted that your client has not furnished true and correct information to you while getting the subject notice issued from your esteemed office. The assertion that Smt. Vijaylaxmi @ M Laxini the mother of your client is the daughter of V Satyanarayana is hereby specifically denied. However it is true that V Satyanarayana, V Rama Chary and V Giri Babu were the owners of land admeasuring Ac.0-15 gts in sy.no.44 and Ac.0-18 gts in sy.no.45 Cherlapally village Ghatkesar mandal RR Dist. It is true that Sri V Satyanarayana, V Rama Chary and V Giri Babu along with other share holders have sold land admeasuring Ac.0-29 gts in sy.no.44 and Ac. 0-36 gts in sy.no.45 totally admeasuring Ac.1-25 gts of Cherlapally village, Ghatkesar mandal RR Dist under a registered sale deed dt. 11.7.2003 being document no.8328/2003 in favour of Sri Madhav Yadav. The said Sri Madhav Yadav along with Sri V Narender and Sri V Narsimlu have sold land admeasuring Ac. 1-09 gts in sy.no.45 in favour of Ms. Hetal K Parikh, Mr. Parvesh B Parikh and Mr. Piyush J Parikh under a registered sale deed dt. 25.5.2006 being document no.7876/06. After purchase the said Ms. Hetal K Parikh and others have got mutated their names in respect of the said land in the revenue record. Subsequently, they have entered into a development agreement with our client under a registered development agreement dt. 10.5.2007 being document no.6334/2007. It is a fact that our client had purchased land admeasuring Ac.1-09 gts from Smt. Patlika B Bhatt under a registered sale deed dt. 31.7.07 being document no.9268/07. Our client has taken up development activity on the entire property i.e, Ac.1-09 gts belonging to Ms. Hetal K Parikh and others and

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Emai : ganu_co@yahoo.com, ganu_co@rediffmail.com; ganu.co@gmail.com

Ac.1-09 gts purchased by our client under a registered instrument. The development activity on the site is in progress and presently the construction is at finishing stage. Our client has thus incurred huge investments in the said project. In such circumstances the assertions sought to be made by your client in the notice under reply claiming a share in the property is not only barred in law but also is an attempt to blackmail our client to illegally enrich himself. The allegation that late Smt. Vijaylaxmi @ M Laxmi, the mother of your client has any share in the land is hereby specifically denied. Our client has represented us to state that V Satyanarayana has only two sons and late Smt. Vijaylaxmi was not the daughter of V Satyanarayana. In such circumstances your client cannot claim any right, title or share in the said property. Our client has entered into the said development agreement with rightful owners of the property and has every right to deal with the share fallen to them as deemed fit and proper by them.

You are, therefore, hereby required to instruct your client accordingly to desist from initiating any such frivolous proceeding as threatened in the notice under reply. In spite of this clear reply, if your client chooses to do so, rest assured the same shall be contested solely at the risk and responsibility of your client as to costs and consequences thereof including this reply notice charges Rs 3000/-.

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Advocate

To Sri Kishore Deshpande, Advocate 4-3-324/1, II & III floors, Bank Street, Koti, Hyderabad 500 095. AFFEROVERS 13 AUG 2009

Sir,

Our clients M/s Mehta & Modi Homes represented by its partner Mr. Soham Modi have placed your notice dt. 13.06.2009 in our hands with instructions to issue the following reply.

1.At the outset it is submitted that your client has not furnished true and correct information to you while getting the subject notice issued from your esteemed office. The assertion that Smt. Vijaylaxmi @ M. Laxmi the mother of your client is the daughter of V Satyanarayana is hereby specifically denied. However, it is true that V Satyanarayana, V Rama Chary and V Giri Babu were the owners of land admeasuring Ac.0-15 gts in sy. No.44 and Ac. 0-18 gts in sy.no.45 Cherlapally village, Ghatkesar mandal RR Dist. It is true that Sri V Satyanarayana, V Rama Chary and V Giri Babu along with other shareholders have sold land admeasuring Ac. 0-29 gts in sy.no 44 and Ac.0-36 gts in 45 totally admeasuring Ac.1-25 gts of Cherlapally village, Ghatkesar mandal RR Dist., under a registered sale deed dt.11.7.2003 being document No.8328/2003 in favour of Sri Madhav Yadav. The said Sri Madhav Yadav along with Sri V Narender and Sri V Narshimlu have sold land admeasuring Ac.1-09 gts in sy.no 45 in favour of Ms. Hetal K Parikh, Mr. Parvesh B Parikh and Mr. Piyush J Prikh under a registered sale deed dt.25.5.2006 being document no.7876/06. After purchase the said Ms. Hetal K Parikh and others have got mutated their names in respect of the said land in the revenue record. Subsequently they have entered into a Development Agreement with our client under a registered Development Agreement dt. 10.5.2007 being document no.6334/2007. It is a fact that our client had purchased land admeasuring Ac.1-09 gts from Smt. Pathika B Bhatt under a registered sale deed dt. 31.7.07 being document no.9268/07. Our client has taken up development activity on the entire property i.e, Ac.1-09 gts belonging to Ms. Hetal K Parikh and others and Ac.1-09 gts purchased by our client under a registered instrument. The development activity av on the site is in progress and presently the construction is at stage. Our client has thus incurred huge investments in the said project. In such circumstances the assertions sought to be made by your client in the notice under reply claiming a share in the property is not only barred in law but also is an attempt to blackmail our client to illegally enrich himself. The allegation that late Smt. Vijaylaxmi @ M Laxmi, the mother of your client has any share in the land is hereby specifically denied. Our client has represented us to state that V Satyanarayana has only two sons and late Smt. Vijaylaxmi was not the daughter of V Satyanarayana. In such circumstances your client cannot claim any right, title or share in the said property. Our client has entered into the said development agreement with rightful owners of the property and has every right to deal with the share fallen to them as deemed fit and proper by them.

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Advocate