

M. Papa Reddy
Sunil B Ganu
Manjiri S Ganu
M. Narsimha Reddy
TS. Praveen Kumar

GANU & CO.
Advocates

Ref. No. N/120/8/2009

BY RPAD

Dt. 21.8.2009

To

Sri V Rajendran,
Advocate
30-1607/1, Suryanagar Enclave
RK Puam Post
Secunderabad

Sir,

Our clients M/s Modi & Modi Constructions represented by its partner Sri Soham Modi has placed your notice dt. 25.6.09 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 your client is the wife of late Sri Pirangi Yadaiah is incorrect. However, it is true that late P Yadaiah, late P Balaiah, late P Venkataiah and late P Kishtaiah were the joint owners and pattedars of lands in sy.nos.75 to 79 and 92 to 98 situated at Rampally village, Keesara mandal RR Dist. The legal heirs of the above mentioned persons have got the said property partitioned among themselves vide registered partition deed dt. 15.6.2005 being document no.3745/05. The assertion that your client has any such share in the property left behind by late P Yadaiah is incorrect and false. If your client had any such right, she would have naturally been a party to the said partition deed. In absence thereof, your client has no right or concern with the said property or any portion thereof. In the circumstances the assertion made in para 4 of the notice under reply are absolutely misconceived, untenable and false. The assertion that your client approached the other co-owners of the property on 23.5.09 and that P Bikshapati and P Rajaiah sons of P Yadaiah colluded with the other co-owners is incorrect.

2. Our client has purchased land admeasuring Ac.0-14 gts forming part of sy.no.75, 77, 78, 79 and 96 from P Rajaiah son of late P Yadaiah under a registered agreement of sale cum-general power of attorney with possession dt. 22.8.08 being document no.6922/08 for valuable consideration. Smt. Sumati and Smt. Varalaxmi daughters

Sunil B Ganu


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of late P Yadaiah have joined execution of the said document as consenting parties. It is pertinent to note that the said P. Rajaiah was allotted Ac.2-28 gts in the said partition in sy.nos.75, 77, 78, 79 and 96 and out of the same land admeasuring Ac.0-14 gts only was transferred in favour of our client under the aforesaid registered agreement of sale-cum-GPA with possession. The said daughters of late PYadaiah themselves had not claimed any share in the property and have joined execution of the said agreement so as to pass on a clear and perfect title in favour of our client, and as such your client does not have and would not have any share in the said land. After the sale transaction, still balance land admeasuring Ac. 2-14 had remained with late Sri Rajaiah and as such if your client has any such alleged share, she can as well agitate the same in respect of the said balance land and cannot claim any rights in the property transferred in favour of our client under a valid document. The entire assertions made in paras 1 to 13 of the notice under reply contrary to the above are incorrect and false. Having purchased the property for valuable consideration, our client has every right to deal with the same as deemed fit and proper by them.

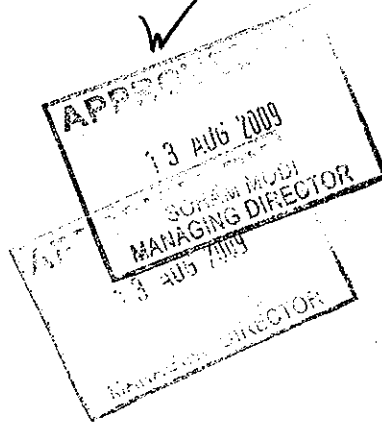
You are, therefore, hereby required to instruct your client accordingly to desist from initiating any such frivolous proceedings as threatened in the notice under reply. In spite of this clear reply, if your client chooses to do so, rest assured, the same shall be contested solely at the risk and responsibility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


Advocate

10-8-2009

To

Sri V Rajendran,
Advocate
30-1607/1,
Suryanagar Enclave
R.K. Puram Post
Secunderabad 500 056.



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Advocate