

Date: 04-02-2016

The Sub-Inspector of Police,
P.S. Medchal, Cyberabad.

Sir,

Sub: Reply to Notice issued in crime No.396 of 2015 of Medchal P.S. –
with Regard.

I, the undersigned respectfully submit the following reply in pursuance to the notice issued to me and 4(four) others under section 41(1)/41-A of Cr. PC. This reply I am submitting on my behalf and also other four persons named in the above crime case.

Sir, the Defacto complainant in the above crime case namely: SMT.V.DHANALAXMI, filed the above complaint with all false and baseless contentions and without any iota of evidences, while suppressing the truth, before your authority and as well before the Hon'ble court of law.

It is to submit to you that prior to filing of the above crime case, the Defacto complainant earlier filed a civil suit vide OS.No.710 of 2010, on the file of Hon'ble X Addl. District Judge, Ranga Reddy District, against all of us, seeking the relief of recovery of money more than Rs.60,00,000/- from us. Subsequent to filing of the said suit, we have filed our detailed written statement while denying the allegations made by her. Thereafter, the said Defacto complainant was examined as PW.1 and her husband V.RAJKUMAR was examined as PW.2.

Contd.2

V.S. [Signature]

It is submitted that in the course of cross examination of Defacto complainant (PW.1) stated that she do not know whether any documents are filed by her to prove that Rs.42,00,000/- was paid by the date of the agreement of sale, upon which the document she relying upon. For ready reference of your authority, I am herewith reproducing the relevant portion of cross examination of the said V.DHANALAXMI (who was PW.1 in the above suit)

"On my instructions only plaint and affidavit in my chief were prepared. My husband also came to court today. The agreement was for purchase of Ac.1.00 land in S.No.50 Muradipally Panchayat in Medchal Mandal, for Rs.51,50,000/- before obtaining Ex.A1 we verified the documents of title and satisfied. On the date of Ex.A1 I paid Rs.42,00,000/-. In Ex.A1 it is mentioned that Rs.12,00,000/- were paid in all by that date. I do not know whether any documents are filed by me to prove that Rs.42,00,000/- was paid by the date of Ex.A1. It is not true to suggest that I paid only Rs.12,00,000/- in all and for that reason I did not file any other documents. I do not know at what times and in what form Rs.42,00,000/- was paid and my husband known it better. My husband knows about Ex.A2 also. I do not know when and where Ex.A2 was executed in between whom and who subscribed it".

Further, even the husband of Defacto complainant who was examined as PW.2 also could not established their case and no document of any kind was submitted to substantiate their claim and case.

Contd.3

V. S. S. —

The above said Hon'ble Court, after examining the witnesses and documents/exhibits, was pleased to pass Judgment, wherein the claim of SMT.V.DHANALAXMI, was rejected and gave clear finding in this regard. For, the ready reference of this authority I am herewith submitting photocopy of certified copy of Judgment passed by the Hon'ble court.

I submit that the above said Judgment became final, since to our knowledge no appeal was filed before the Hon'ble High Court and no court notices were received to us as per procedure.

That the Defacto complainant, since already initiated proceedings under civil laws, having failed to prove her case, now subsequent to dismissal of the above suit filed the present complaint with all false and baseless contentions. Further, while misrepresenting the truth, she intends to harass us and create troubles to us.

Thus, in view of above said facts the disputes between the parties is sub-judies and civil in nature. However, with the help of certain fabricated documents, which never produced or got marked as exhibits before the above said court of law, for the first time bringing the same into existence by the Defacto complainant with the able support of her husband V.RAJKUMAR, in order to take advantage of the situation. None of the of sections of IPC which were quoted by the Defacto complainant in her complaint were attracts in the present crime case.

Further, we respectfully submits that except receiving above notice, under section 41 of Cr. PC, no copy of complaint nor supporting documents if any filed by the Defacto complainant were furnished to us, which enables us to give effective and suitable reply. Further, we are permanent residence of Ranga Reddy/Medak District and ready to assist the investigation agency from time to time, to prove our innocence.

V. G. S. —

Contd.4

Under these circumstances, it is therefore prayed that this investigating authority may be pleased to reject the above complaint filed by the Defacto Complainant or otherwise great injustice will be caused to us and for no fault of us we shall suffer a lot, on the ground of false complaint and the matter is civil in nature, which is sub-judies.

Thanking you sir.

Yours faithfully



(VUPPALA SRIDHAR)

S/O V.NARSAIAH,
R/O 10-22, Gajwel Village
And Mandal, Medak District.

Enclosures:

Copy of Judgment
In OS.No.710 of 2010