

G.L.NARASIMHA RAO

Advocate



H.No.3-4-778, BARKATPURA,
HYDERABAD -500 027.
Cell:9848994210

BY REGD. POST WITH ACK. DUE

To

Date: 26-05-2014

Sri C. Bala Gopal, Advocate, Door No.10-2-278, Flat No.103,
Suresh Harivillu Apartments, Road No.11, West Marredpally,
Secunderabad - 500 026.

Ref: Your notice dated 15-05-2014.

Under the instructions of my client Mr. A. Bhaskar, S/o Ramappa, R/o 1-24-253/1, Plot No.32, Sri Sainagar Colony, Lothugunta, Alwal, Secunderabad, Hyderabad issuing the following reply notice for your notice dated 15-05-2014.

It is represented my client is not disputing anything regarding para No.1 of your notice and he did not require any reply.

It is represented by my client regarding para No.2 of your notice it is true that my client's son was approached your client for purchase of Villa No.46 in the said venture for a total consideration of Rs.39.00 lakhs. But your client was suppressed the time for payment of the transaction regarding the villa instead of 9 months of payment, your client by malafied intention brought an agreement for 4 months. In that manner, the entire amounts sanctioned by the LIC Housing Board on the name of my client's son but unfortunately with the transactions only your client obtained a cheque for realisation of amounts Rs.9.75,000/- by taking the cheque of my client as a security for promotion of your business to not to drop by my client's son to purchase the villa No.46. Your client conforward for assisting financial assistance to my client's son. In this regard your client rotated Rs.2,43,750/- as installments in a rotation manner duly obtained pre-undated cheques from my client. The details and modus operandi of your client rotation is as below.

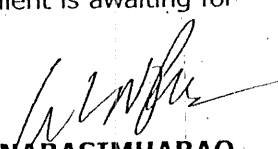
Amount	Date of credit to A.Bhaskar's account by M/s Modi	Date of debit from Bhaskar account to AV Mahesh Kumar A/C	Date of Credit to AV Mahesh Kumar A/C from A Bhaskar	Date of debit to M/s Modi account from Mahesh Kumar A/C
243750	17-Sep-13	21-Sep-13	21-Sep-13	24-Sep-13
243750	28-Sep-13	10-Oct-13	10-Oct-13	17-Oct-13
243750	21-Oct-13	25-Oct-13	25-Oct-13	31-Oct-13
243750	08-Nov-13	13-Nov-13	13-Nov-13	18-Nov-13

975000

It is represented by my client that there is no any transaction between my client and your client in any way except the purchase of villa No.46 in Neelagiri Homes at Rampally village, Keesara Mandal. As such, you have taken a cheque from my client as a security under guise of that your client was released amounts to my client and the same was taken by your client for the transaction of said villa. But as on today, even did not handed over the villa to my client's son when he is going to file a consumer case, your client tactically presented my client's cheque whereas the above said cheque which was issued to your client only for security purpose and there is no any financial transacation to my client as stated by your client except the villa 46. As such, there is no legally entitled debt by my client to your client.

My client is also represented that as being legal advisor to your client please advise your client not to harass the customers and his family members of your clients in one way or other and advise your client to handover the said villa 46 at Neelagiri Homes to my client's son. Then my client's son will instructed to his financier to release the remaining amounts which was retained by the financier for want of completion of said villa and my client is ready to honour your cheque once again if you deposited in the bank after handing over the villa No.46 to my client's son along with occuation letter after completion of entire works. As such, there is no any legally entitled debts between your client and my client. The notice is mere creating mental agony and harassment to my client and his son. Therefore, this reply and please advise your client to drop your notice and any further proceedings in this regard. Your clients amounts are well retained with the LIC house loan as well as in the account of my client as stated above, which was sanctioned on the name of my client's son. Thereby advise your client to give letter of occupation certificate to my client's son regarding the villa 46 of Neelagiri Homes and taken those amounts which was ready to release from the above said financier and account and drop for the proceeding in the case instead of handing over the villa to my client's son. My client is awaiting for your occupation certification or reply to this reply notice.

Hence, this reply.


G.L.NARASIMHARAO
Advocate

Copt to:
Modi & Modi Constructions Rep. by its Partner Soham Modi,
H No 5-4-187/3 & 4 2nd Floor MG Road, Secunderabad-500002