

Eranki Phani Kumar
ADVOCATE

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To

1. Mogulla Jagan Mohan Reddy,
S/o Late Shankar Reddy,
aged 56 years, Occ: Business,
R/o. 1291/B, Pioneer Bazar,
Bollaram, Secunderabad-500010.

2. Mogulla Madhu Mohan Reddy,
S/o Late Shankar Reddy,
aged 53 years, Occ: Business,
R/o. Plot No. 45, 2-9-57/7/3,
Sai Nagar Colony, Macha Bollaram,
Farzandiguda, Secunderabad-500010

3. Mogulla Indiramma,
W/o Late Shankar Reddy,
Aged 75 years, cc: House Wife,
R/o. 1291/B, Pioneer Bazar,
Bollaram, Secunderabad-500010.

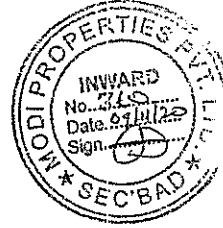
4. Mogulla Sudheer Reddy,
S/o Late M. Narayana Reddy,
Aged 49 years, Occ: Business,
R/o Flat No.308 & 309, Survey No.94
V S S Nandadeep Apartments,
Beside Suraksha Hospital, Jeedimetla,
Qutubullapur, Hyderabad, Telangana-500067

5. Mogulla Sushanth Reddy,
S/o Late Mogulla Narayana Reddy,
Aged 46 years, Occ: Service,
R/o Sy. No.93/P, flat No.504, D-Block, 5th floor,
NCL Sindhu Apartments, Pet Basheerabad,
Near RTA Office, Medchal, Jeedimetla,
Hyderabad, Telangana-500055.

6. Smt. Musku Sunitha, W/o Ramana Reddy,
Aged 51 years, Occ: House Wife,
R/o Flat No. 505, Laxmi Arcade, Laxmi Enclave Colony,
Near Konark Hospital, Jeedimetla,
Qutubullapur, Hyderabad, Telangana-500055.

7. Smt. Mogulla Kamala, W/o Late Mogulla Narayana Reddy,
Aged 69 years, Occ: House Wife,
R/o Flat No.308, Survey No.94
V S S Nandadeep Apartments,
Beside Suraksha Hospital, Jeedimetla,
Qutubullapur, Hyderabad, Telangana-500067

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8. Mogulla Srinivasa Reddy,
S/o late Mogulla Raji Reddy,
Aged 69 years, Occ: Nil,
R/o 2,2,218/22, Ganesh Nagar, Macha Bollaram,
Secunderabad, Telangana - 500010

9. M. Sai Reddy, S/o late M. Narasa Reddy,
Aged 67 years, Occ: Agriculture,
R/o Sai Nilayam, Plot No.26 (SCB), 8-14-029,
Shanti Nagar, Risala Bazar,
Secunderabad-500010.

10. M. Sanjeev Reddy, S/o late M. Narasa Reddy,
Aged 57 years, Occ: Agriculture,
R/o Plot No.38, Opp: building to Plot No.8,
Gummadi Krishna Reddy-Buttonguda, Bollaram,
Secunderabad-500010.

11. M. Srinivas Reddy S/o late M. Narasa Reddy,
Aged 56 years, Occ: Agriculture,
R/o Fortune Avenue, Survey No.198,199, 201
Kowkoo Village, Bollaram,
Secunderabad- 500010.

12. M. Balvanth Reddy S/o late M. Narasa Reddy,
Aged 52 years, Occ: Agriculture,
R/o 2-9-110, Behind Kotwal School,
Beside Hanuman Temple, Buttonguda, Bollaram,
Secunderabad-500010.

13. Mr. Bhaskar K Bhatt,
S/o K R Bhatt, aged 54 years,
Occ: Busbusiness,
R/o#114, Arya Samaj Building,
Secunderabad-500003.

14. Karnati Bhaskar,
S/o K Narasimha, aged 54 years,
Occ: Business, R/o 2-44/1,
Sainagar, Chaitanyapuri,
Dilshukhnagar, Hyderabad-500060.

15. K. Gopinath, S/o K. Bhaskar,
Aged 31 years, Occ: Business,
R/o. R/o 2-44/1,
Sainagar, Chaitanyapuri,
Dilshukhnagar, Hyderabad-500060.

16. A. Purushotham, S/o A. Vittal,
Aged 54 years, Occ: Business,
R/o 1-3-1/C/1, Flat No. 101,
1st Floor, Jaya Mansion,
Kavadiguda, Hyderabad-500080.

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17. A. Srinivas S/o A. Vittal,
Aged 46 years, Occ: Business,
R/o 2-44/1, Sainagar,
Chaitanyapuri,
Dilshukhnagar, Hyderabad-500060.

18. Belide Venkatesh, S/o B. Eshwaraiah,
Aged 53 years, Occ: Business,
R/o 1-3-2/C/1, Kisan Nagar,
Bhongiri, Nalgonda-508116.

19. Green Wood Estate,
A registered Partnership Firm,
Rep. by its Partner Mr. Meet B Mehta,
S/o Bharath B Mehta, aged 43 years,
Office at Shop Nos. 1,2 and 3, Ground Floor,
Hari Ganga Complex, Ranigunj, Secunderabad-500003.

(19a) Shri Meet B. Mehta S/o Bharat U. Mehta,
aged 44 years, Occupation: Business,
R/o Plot No. 21, Bapubagh Colony, P.G.Road,
Secunderabad - 500003

(19b) Smt. K. Sridevi W/o Sri K.V.S.Reddy,
aged 45 years, R/o flat No.305, Srinilaya Estates,
Ameerpet, Hyderabad-500016.

(19c) Modi Housing Pvt. Ltd.,
A Company incorporated under the Companies Act, 1956,
Regd. Office at 5-4-187/3 & 4, Soham mansion, II Floor,
M.G.Road, Secunderabad - 500003

20. P. Pradeep Surana, S/o Parasmul Surana,
Aged 47 years, Occ: Business,
R/o H.No. 516, Sadar Bazar,
Bollarum, Secunderabad.-500010

21. E.B. Nagaraj, s/o E.P. Balraj,
Aged 47 years, Occ: Employee,
R/o 10-83, Temple Alwal,
Bollarum, Secunderabad-500010.

22. P. Suresh Reddy,
S/o P. Sudhakar Reddy,
Aged 51 years, occ: Business,
R/o H.No. 3-5-167/B, Venkateshwara Colony,
Narayanaguda, Hyderabad- 500029.

23. P. Rupa, W/o P. Suresh Reddy,
Aged 48 years, Occ: House Wife,
R/o H.No. 3-5-167/B, Venkateshwara Colony,
Narayanaguda, Hyderabad-500029.

24. P. Surender Reddy, S/o P. Krishna Reddy,
Aged 51 years, Occ: Business,
R/o H.No. 3-5-167/B, Venkateshwara Colony,
Narayanaguda, Hyderabad- 500029.

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Sir/Madam,

I am concerned for my client Mrs. T. Anuroopa Reddy, W/o T. Shankar Reddy, aged 61 years, Occ: House Wife, R/o Flat No. 302, Sri Sai Krupa Residency, Opp: Temple Alwal P.S., Secunderabad-500 010, under whose instructions I address you as under:

2. Whereas, grandfather of my client and 1,2,4,5,6 namely Mogulla Raja Reddy who is the father-in-law of 3 and 7 above named and father of 8 above named acquired land admeasuring Ac.20-32 guntas covered by Sy.Nos. 202, 205, 206 and 145 vide registered sale deed document No. 996 dated 05/12/1358 Fasli situated at Koukur Village, Cantonment, Bollaram, Secunderabad. Late Mogulla Raja Reddy further purchased land admeasuring Ac. 2-12 guntas in Sy. Nos. 203 and 204 situated at Koukur Village, Cantonment, Bollaram, Secunderabad under sale deed dated 29/12/1954 from Mogulla Narsa Reddy.

3. Whereas, Mogulla Raja Reddy died intestate in the year 1976 and his wife Lingamma died in the year 1995. Late Mogulla Raja Reddy and Lingamma had 3 sons namely Mogulla Shankar Reddy, Mogulla Narayana Reddy and Mogulla Srinivasa Reddy. While so, Mogulla Shankar Reddy died intestate in the year 1993 leaving behind him my client as the only daughter and two sons and wife being 1 to 3 of you above named. Sri Mogulla Narayana Reddy is the 2nd son of Late Mogulla Raja Reddy who died intestate in the year 1984 leaving behind him 2 sons, daughter and wife i.e. 4 to 7 of you above named. 3rd son of Late Mogulla Raja Reddy is 8th of you above named.

4. Whereas, 9 to 12 of you above named entered into a fraudulent Registered Partition Deed document No.57 of 2007 dt.5th January,

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2007 with 1, 2, 4 and 5 above named and partitioned the lands in Survey Nos.202, 203, 204, 205 & 206 by mis-representing that father of 9 to 12 of you above named viz., late Narasa Reddy was the joint owner of lands with late Sri Mogulla Shankar Reddy and late Sri Mogulla Narayan Reddy in the ratio of 1: 1: 2 respectively, which is contrary to record, since the said allegation was fabricated without even referring to any registered Sale deed under which the said Narasa Reddy was allegedly referred as a joint owner in the ratio referred in the partition deed. The said Registered partition deed was drawn by 9 to 12 of you above named with a view to have wrongful gain without any right, title or interest. My client has a reason to believe that 9 to 12 of you above named by suppressing the true and real facts clandestinely entered into the said registered Partition Deed keeping the 1, 2, 4 and 5 of you above named in dark and mis-guided them about the Sale deeds in the name of late Mogulla Raja Reddy as described above and thus influenced the 1, 2, 4 & 5 to join for partition. As my client above named is not a party to the above referred Registered partition Deed and was drawn behind the back of my client suppressing her right, the said partition deed does not bind her and is otherwise an invalid document considering the 9 to 12 of you above named joining the same without any interest, right or title over the lands mentioned therein.

5. Whereas, 13 of you above named is a purchaser of Ac.1-00 in S.No.202, 203, 204 and 205 of Kowkur Village, Malkajgiri Mandal, RR District, from 1, 2, 4 and 5 above named and 3 and 6 above named as consenting parties.

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6. Whereas, 14 to 18 above named are purchasers of land admeasuring Ac.3-05 guntas in S.Nos. 202, 203, 204, 205 and 206 of Kowkur Village, Bollarum, RR District. from 1, 2, 4 and 5 above named and 3 and 6 above named as consenting parties

7. Whereas, 19 of you above named being a Partnership firm is a purchaser of land admeasuring Ac.2-00 in Survey Nos.202, 203,204, 205 & 206 of Kowkur village, Malkajgiri Mandal, RR District from 1, 2, 4 and 5 above named and 3 and 6 above named as consenting parties. 19th of you above named is a Partnership firm represented by its partners (19 a, b & c) above named.

8. Whereas, 20 to 22 of you above named are purchasers of land admeasuring Ac.0-10.67 guntas in Survey Nos.202, 203,204, 205 & 206 of Kowkur village, Malkajgiri Mandal, RR District from 1, 2, 4 and 5 above named and 3 and 6 above named as consenting parties. Later, a Regd. Ratification was obtained from 7 of you above named.

9. Whereas, 23 to 25 of you above named obtained a Exchange Deed in respect of your land admeasuring Ac.0-29.55 guntas in Survey No.198 of Kowkur village, Malkajgiri Mandal, RR District against land admeasuring Ac.0-14.77 guntas in S. No. 202 of Kowkur Village, Malkajgiri Mandal, RR District, from 4 and 5 of you above named.

10. That, 19th of you above named obtained approval for construction of residential apartments comprising of stilt +5 floors over land in S.No.203, 204, 205 & 206, 202 (p) of Kowkoor Village, Malkajgiri Mandal, Alwal Municipality, RR District. 19th of you along with. 13 to 18th of you above named entered into various development agreements to develop the properties as purchased and even developed the same. The said properties being joint Hindu undivided

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family properties, my client has an undivided right, title and interest over the same and is deeded to be in joint possession of the same.

11. That, from the above narration, it is prima facie clear that all of you above named in collusion with each other connived to deprive the legitimate share of my client and thus entered into the above clandestine transactions by putting my client in dark and behind her back and all the documents as collusively entered are liable to be declared as invalid.

12. That, my client has been demanding her family members for a fair partition of her share and for delivery of separate possession and however all the while, it was postponed indefinitely. My client becoming suspicious of such delay in settling her share, started investigation into the deals and could learn about the above clandestine deals as entered by you all which are liable to be declared as invalid since my client's right in the joint family properties about her share and joint possession has been unlawfully managed and alienated without her consent.

In the above circumstances, I do hereby call upon you all on behalf of my client above named to identify her separate share and deliver the same duly partitioning the lands by metes and bounds, within 7 days from the date of receipt of this legal demand notice, failing which, my client will be constrained to take all appropriate legal steps for filing a suit for partition besides claiming mesne profits and all other reliefs as may be appropriate under law, while holding you all responsible jointly and severally for all the costs and consequences arising thereof.

R. Pham Kumar
ADVOCATE