

Mayank Khandelwal

Advocate

Through Registered Post/E-mail/WhatsApp

Date : 24.02.2026

To,

Mr. Anil Kumar (Advocate)

[Chamber No. 311 “E” Block Rajasthan High Court, Jaipur, Rajasthan - 302001]

And

1. Mr. L.N. Chaudhry (Allen Mechu) Resident of Vaishali Nagar, Jaipur, Rajasthan – 302021 Mobile No.: +91 7426060193

2. Mr. Sandeep Sigar Owner – Setup FX 44 Convention Tower, World Trade Center, Dubai Mobile No.: +91 9799107600 (Previous owner Company Pink City Jaipur)

3. Mr. Ankit Agrawal Owner WPS Technology S/o Mr. Rajesh Kumar 37, Nandpuri, Malviya Nagar, Jaipur, Rajasthan Mobile No.: +91 9460055704

4. Mr. Tarun Mishra Owner Webhence Innovations (Opc) Private Limited, Plot No5,7 First Floor SM, Tower 7 Teachers Colony, Vaishali Nagar, Jaipur, Jaipur, Rajasthan, India, 302021.

5. Mr. Harsh Saini and Tarun Mishra joint Director of PROFITHILLS EDUCATION PRIVATE LIMITED P.no. 7 Teachers Colony, Baba Market Dcm, Ajmer Road, Jaipur, Jaipur, Rajasthan, India, 302006

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SUBJECT : COUNTER LEGAL NOTICE FOR DEFAMATION, HARASSMENT AND MISUSE OF LEGAL PROCESS – CALLING UPON YOU TO WITHDRAW FALSE NOTICE DATED 11.02.2026 AND TENDER UNCONDITIONAL APOLOGY.

Dear Sir,

Under the instructions and on behalf of my client, **Mr. Lalit Kaura** S/O Jagmohan Singh, Ashok Nagar Salem Tabri near Jalandar Bypass, Ludhiana, Punjab -141008, I hereby issue this reply to your legal notice dated 11.02.2026, sent on behalf of your alleged client Mr. Allen Mechu. At the outset, my client categorically denies each and every false, baseless, misleading and malicious allegation contained in your said notice. The contents of your notice are nothing but a deliberate attempt to misuse the process of law, intimidate my client and suppress the truth. Your allegations regarding defamation, criminal intimidation, provocation and leakage of confidential documents are absolutely false, concocted and unsupported by any material evidence. The same have been made with malafide intention solely to harass my client and malign his reputation. It is submitted that my client has never made any false, defamatory or scandalous statement against your client on any social media platform or otherwise. Whatever statements, if any, were made were based strictly on facts, public records and circumstances, and were made in good faith without any intention to harm anyone's reputation.

The contents of Point No. 1 of your notice are emphatically denied as false, misleading and self-serving. It is denied that your alleged client Mr. Allen Mechu

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is a “highly reputable” or “esteemed” individual having an “impeccable” or “unblemished” reputation, as claimed. The said statements are exaggerated, baseless and unsupported by any documentary or legal proof. It is submitted that mere self-proclamation of reputation does not confer credibility in the eyes of law. Reputation, if any, must be established through verifiable conduct, transparent dealings and lawful activities, which your client has failed to demonstrate. My client denies that your client enjoys any untarnished standing in society. On the contrary, several facts, circumstances and complaints are in existence which seriously question his conduct, integrity and business practices, and are well known in public domain. Any attempt by your client to project himself as a victim while suppressing material facts is nothing but a deliberate effort to mislead and manipulate legal proceedings. The allegation that any statement made by my client has tarnished your client’s reputation is also denied. No unlawful, defamatory or malicious act has ever been committed by my client. Hence, the contents of Point No. 1 are rejected in toto and are liable to be ignored.

The contents of Point No. 2 of your notice are categorically denied as false, vague, defamatory and devoid of any legal merit. It is specifically denied that my client has circulated, published or disseminated any false, fabricated or malicious information against your alleged client on YouTube, Instagram, Telegram or any other platform. The allegations are bald assertions without a single specific detail, date, link, screenshot or material evidence to substantiate the same. Your notice deliberately fails to identify the alleged posts, statements, videos or content purportedly published by my client. Such sweeping and unparticularized accusations clearly indicate that the claims are imaginary and designed only to

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create pressure. It is further denied that my client has acted with any malafide intention to damage the reputation of your client. If any communication or statement was made, the same was either based on factual information, public records, or constituted fair comment made in good faith, which is protected under law.

The allegation that my client has been issuing threats or conducting a “venomous campaign” is strongly denied. These expressions are inflammatory and intended to dramatize the matter without factual foundation. Your attempt to portray lawful expression or factual communication as defamation is legally unsustainable. Freedom of speech, fair comment and bona fide communication of facts cannot be misconstrued as a malicious campaign. Therefore, the entirety of Point No. 2 is false, misconceived and liable to be rejected in toto.

The contents of Point No. 3 of your notice are vehemently denied as false, imaginary, exaggerated and legally untenable. It is specifically denied that any act or remark of my client has caused any damage, grievous or otherwise, to the reputation, goodwill or social standing of your alleged client. The allegations are purely speculative and unsupported by any credible evidence. Your claim that my client acted “willfully, deliberately and with malice aforethought” is baseless and has been made without any factual foundation. No material has been produced to demonstrate any intention, motive or mens rea on the part of my client. It is further denied that your client’s reputation has been “irreparably ruined” or “catastrophically damaged” due to any act of my client. These are hyperbolic and self-serving assertions, deliberately inserted to inflate a false cause of action. Your notice fails to establish any causal nexus between the alleged statements and the

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purported damage claimed. In absence of proof of actual loss, harm or adverse consequence, the allegations are legally unsustainable. It is submitted that mere circulation of information based on facts, public domain material or bona fide opinion does not constitute defamation under law. Lawful expression and fair criticism cannot be mischaracterized as malicious conduct. The sweeping allegation that millions have accessed alleged defamatory material is denied for want of proof. No data, analytics, links or authenticated records have been furnished to substantiate such claims. Hence, the contents of Point No. 3 are denied in entirety and are liable to be rejected in toto.

The contents of Point No. 4 of your notice are categorically denied as false, misleading, exaggerated and devoid of any factual or legal basis. It is specifically denied that my client has made any scandalous, scurrilous, defamatory, libelous or slanderous remarks against your alleged client on any social media platform or otherwise. The allegations are vague, generalized and unsupported by any documentary, electronic or circumstantial evidence. Your notice once again fails to disclose the alleged offending material, including its date, platform, link, content, authorship or authenticity. In the absence of such particulars, the allegations are nothing but speculative assertions, made solely to create a false narrative. It is further denied that any communication made by my client was false, fabricated or intended to humiliate, disgrace or destroy the image of your client. If any statement was made, the same was either based on verifiable facts, public records or constituted fair and bona fide comment made in public interest. The allegation of “premeditated and malicious intention” is imaginary and has been inserted without any supporting material. No act of my client reflects any intent to defame or harm

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your client. The claim that your client has suffered “catastrophic and irreparable damage” is denied for want of proof. No credible evidence, data or independent verification has been produced to substantiate such alleged loss of reputation. It is submitted that lawful expression, fair criticism and disclosure of facts cannot be construed as defamation merely because they are inconvenient to your client. The impugned allegations are therefore baseless, legally unsustainable and liable to be rejected in toto.

The contents of Point No. 5 of your notice are categorically denied as false, misleading, exaggerated and devoid of any factual or legal basis. It is submitted that my client, Mr. Lalit Kaura, is himself a victim of large-scale financial fraud perpetrated through fraudulent schemes including DGICX and XPO. My client has suffered substantial financial loss and mental harassment on account of such illegal activities. My client has merely raised his voice along with several other affected investors and victims, with the sole intention of seeking justice and encouraging lawful action against fraudulent MLM and Ponzi schemes, so as to prevent further innocent persons from being deceived in future. It is pertinent to state that two First Information Reports have already been registered at Police Station Bhusawar, District Bharatpur, Rajasthan, being FIR No. 0363 and FIR No. 0364 dated 01.12.2025, under serious penal provisions relating to cheating, criminal breach of trust, illegal deposit schemes and chit fund operations. In the said FIRs, Mr. L.N. Chaudhry, his brother Raman Chaudhry, Mr. Sandeep Sigar and other associates are named as accused and are facing investigation for grave economic offences. It is further submitted that instead of cooperating with the investigating agencies, some of the accused persons are presently residing abroad, including in Dubai,

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under Golden Visa arrangements, which itself raises serious concerns regarding their conduct and intent. In view of the above, any statement or communication made by my client was strictly based on public records, registered criminal cases and bona fide grievance of victims, and therefore falls within the ambit of truth, public interest and lawful disclosure. My client has never indulged in any malicious, defamatory or vindictive campaign. On the contrary, he has acted as a whistleblower and social activist for the protection of public interest and prevention of financial fraud. The attempt of your client to portray himself as a victim, while suppressing the existence of serious criminal proceedings pending against him, amounts to gross misuse of legal process and deliberate concealment of material facts. The allegation of “catastrophic and irreparable damage” is wholly misconceived. Any reputational consequence, if at all, has arisen solely due to your client’s own acts, omissions and unlawful conduct, and not due to any action of my client. Your client cannot be permitted to use defamation law as a shield to escape accountability for financial crimes and to silence victims. Hence, the contents of Point No. 5 are denied in entirety and are liable to be rejected

The contents of Point No. 6 of your notice are wholly false, baseless, misleading and are therefore emphatically denied. It is categorically denied that my client has indulged in any “vicious, relentless, systematic or malicious” campaign against your alleged client. Such allegations are nothing but exaggerated rhetoric, deliberately used to sensationalize the matter without any factual foundation. My client has never spread any false, fabricated or poisonous rumours against your client on any social media platform or otherwise. Your notice once again fails to disclose any specific instance, date, platform, content or material evidence to

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support these sweeping allegations. It is submitted that raising legitimate grievances, sharing information based on public records, and encouraging victims to seek legal remedies cannot, by any stretch of imagination, be termed as criminal conduct or conspiracy.

On the contrary, my client has consistently acted in a responsible, lawful and transparent manner while highlighting issues relating to financial fraud and public deception, which is in larger public interest. The allegation of “premeditated criminal conspiracy” is absurd, imaginary and legally untenable. No material has been placed on record to establish any agreement, intention or overt act on the part of my client which could constitute any offence under law. It is evident that such reckless accusations have been made solely to intimidate my client, silence victims and divert attention from the serious criminal proceedings already pending against your client and his associates. Your attempt to misuse defamation law as a tool to suppress truth and stifle lawful dissent is strongly condemned and shall be appropriately dealt with in accordance with law. Hence, the contents of Point No. 6 are denied in entirety and are liable to be rejected.

The contents of Point No. 7 of your notice are emphatically denied as false, malicious, misleading and legally untenable. It is categorically denied that my client has ever provoked, instigated or incited the general public against your alleged client or any other person. The allegations of incitement, criminal intimidation and provocation are imaginary, exaggerated and unsupported by any material evidence. It is submitted that my client has merely shared factual information and raised legitimate concerns relating to large-scale financial frauds, based on public records and duly registered criminal cases. In this regard, it is

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pertinent to reiterate that two First Information Reports, being FIR No. 0363 and FIR No. 0364 dated 01.12.2025, have been registered at Police Station Bhusawar, District Bharatpur, Rajasthan, under serious penal provisions relating to cheating, criminal breach of trust, illegal deposit schemes and chit fund operations, wherein your client and his associates have been named as accused. Therefore, any discussion, communication or awareness created by my client is founded upon officially recorded criminal proceedings and genuine grievances of multiple victims, and cannot be misconstrued as provocation or incitement. My client has at all times appealed to affected persons to adopt lawful and constitutional remedies and has never encouraged violence, unlawful activity or public disorder. The allegation that my client intended to cause harm to your client's life, property, livelihood or business is baseless and defamatory. No such act, statement or conduct has ever been attributed to my client with any supporting proof. On the contrary, the present notice appears to be a calculated attempt to portray legitimate whistleblowing and victim advocacy as criminal conduct, with the sole objective of shielding the accused persons from legal accountability. The invocation of penal provisions under the Bharatiya Nyaya Sanhita, 2023, is misconceived and amounts to misuse of criminal law for private vendetta and intimidation. It is submitted that suppression of material facts regarding pending criminal cases against your client and simultaneous levelling of false allegations against my client constitutes gross abuse of legal process. Hence, the contents of Point No. 7 are denied in entirety and are liable to be rejected.

The contents of Point No. 9 of your notice are categorically denied as false, baseless, misleading and legally unsustainable. It is specifically denied that my

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client has ever illegally, unlawfully or criminally leaked any confidential court document, judicial record or proceeding to any person or platform. The said allegation is vague, speculative and unsupported by any material evidence. Your notice deliberately fails to disclose the nature of the alleged document, the date of its purported leakage, the forum before which it was pending, or the manner in which the same was allegedly disseminated. In the absence of such particulars, the allegation is nothing but a reckless and defamatory assertion. It is submitted that all information, documents and records, if any, referred to or shared by my client, were obtained from lawful sources, public domain records, certified copies or official communications, and were utilized strictly for lawful purposes and in good faith. My client has at all times maintained utmost respect for the judiciary and the sanctity of judicial proceedings. He has never indulged in any act which could amount to contempt of court or interference with the administration of justice. The allegation that my client intended to prejudice pending proceedings, influence public opinion or obstruct justice is imaginary and has been made without any supporting material. On the contrary, it is your client who has sought to misuse legal proceedings by issuing frivolous and intimidating notices to silence victims and whistleblowers. The threatened initiation of contempt proceedings is nothing but an attempt to browbeat my client and discourage lawful expression. Such tactics are deprecated in law and shall be resisted with full force. It is submitted that fair reporting, lawful disclosure of public records and dissemination of truthful information in public interest do not constitute contempt or criminal misconduct. Hence, the contents of Point No. 9 are denied in entirety and are liable to be rejected.

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The contents of Point No. 10 of your notice are wholly false, misleading, legally misconceived and are therefore emphatically denied. Your baseless invocation of multiple penal provisions is nothing but a deliberate attempt to threaten, intimidate and harass my client, without any factual or legal foundation.

(a) Sections 356 & 357 of the Bharatiya Nyaya Sanhita, 2023 (Defamation)

It is denied that my client has committed any act constituting defamation under Sections 356 or 357 of the BNS, 2023. All statements made by my client were based on public records, registered FIRs and bona fide grievances of victims, and were made in good faith and in public interest. Truthful disclosure and fair comment do not amount to defamation under law.

(b) Sections 351 & 351(2) of the Bharatiya Nyaya Sanhita, 2023 (Criminal Intimidation)

It is categorically denied that my client has ever threatened, intimidated or coerced your client in any manner whatsoever. No evidence of any threat, coercion or unlawful demand has been produced.

(c) Section 352 of the Bharatiya Nyaya Sanhita, 2023 (Intentional Insult)

The allegation of intentional insult is denied. No abusive, humiliating or provocative language has ever been used by my client. Raising legitimate concerns and seeking accountability cannot be termed as insult.

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(d) Section 61 of the Bharatiya Nyaya Sanhita, 2023 (Criminal Conspiracy)

The allegation of criminal conspiracy is imaginary and absurd. No agreement, meeting of minds or overt act has been alleged or established. The provision has been casually invoked without satisfying its basic ingredients.

(e) Bharatiya Suraksha Sanhita, 2023 (BSS)

The reference to the Bharatiya Suraksha Sanhita, 2023 is wholly misconceived, as the said statute primarily deals with procedural aspects and does not create substantive criminal liability in the manner alleged.

(f) Information Technology Act, 2000

It is denied that my client has published or transmitted any obscene, defamatory or unlawful content in violation of the Information Technology Act, 2000. No specific URL, electronic record, metadata or forensic evidence has been produced to support this allegation.

(g) Alleged Contempt of Court

It is denied that my client has committed any act amounting to contempt of court. No confidential judicial record has ever been unlawfully disclosed. Lawful sharing of public documents does not constitute contempt. It is pertinent to highlight that while falsely accusing my client, your client has deliberately suppressed the material fact that he and his associates are themselves named as accused in multiple criminal cases. Two FIRs, being FIR No. 0363 and FIR No. 0364 dated 01.12.2025, registered at Police Station Bhusawar, District Bharatpur, Rajasthan,

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contain serious allegations under various provisions relating to cheating, criminal breach of trust, illegal deposit schemes and chit fund operations. In the said FIRs, your client, his brother Raman Chaudhry, Mr. Sandeep Sagar and other associates are facing investigation for grave economic offences involving public money. Instead of submitting themselves to due process of law, some of the accused persons are presently residing abroad, including in Dubai, under Golden Visa arrangements, thereby evading effective investigation and accountability. A person who is himself facing multiple serious criminal allegations cannot be permitted to misuse defamation laws as a shield to silence victims and whistleblowers.

Your reckless invocation of multiple penal provisions, without satisfying their essential ingredients, amounts to gross abuse of legal process and professional misconduct. This notice has been issued not for redressal of any genuine grievance, but solely to intimidate my client and suppress the exposure of financial frauds. Hence, the allegations under Point No. 10 are denied in entirety. My client reserves his right to initiate appropriate civil, criminal and constitutional remedies against your client for malicious prosecution, defamation, harassment and abuse of process of law.

The contents of Point No. 11 of your notice are wholly false, exaggerated, misleading and legally unsustainable and are therefore emphatically denied. It is categorically denied that my client is liable for any civil damages, compensation or monetary claim of any nature whatsoever, including the alleged amount of Rs. 20,00,00,000/-. Your claim of damages is arbitrary, speculative, imaginary and has been grossly inflated without any legal basis, documentary proof or independent

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assessment. No material has been placed on record to establish any actual loss, financial injury or reputational damage allegedly suffered by your client.

It is submitted that vague allegations of “mental agony”, “harassment” and “loss of goodwill” without any supporting medical, financial or expert evidence are legally untenable and cannot form the basis of any civil liability. On the contrary, my client has himself suffered substantial financial loss, mental trauma and social hardship as a result of fraudulent schemes operated by your client and his associates, which are presently under criminal investigation. The attempt to claim exorbitant damages is nothing but a pressure tactic to coerce my client into silence and to deter other victims from pursuing lawful remedies. It is further submitted that any alleged loss, if at all, has arisen solely due to your client’s own unlawful acts, criminal proceedings and adverse public scrutiny, and not due to any act or omission of my client. Your client cannot be permitted to enrich himself through false litigation and misuse of judicial process. Hence, the monetary claim of Rs. 20,00,00,000/- is frivolous, vexatious and liable to be rejected with exemplary costs. My client reserves his right to initiate appropriate proceedings for recovery of damages and compensation for malicious prosecution, harassment and abuse of process of law against your client.

The contents of Point No. 12 of your notice are false, misleading, intimidating and legally misconceived and are therefore emphatically denied. It is denied that my client or any person acting on his behalf has engaged in any unlawful activity or has conspired with any third party to spread defamatory content, rumours, false information or confidential material. The sweeping attempt to issue threats and

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warnings not only to my client but also to unnamed “associates” and “like-minded persons” is arbitrary, vague and contrary to established principles of law.

Such generalized intimidation, without identification of any individual or specific act, reflects a clear intention to create fear, suppress lawful expression and discourage victims from seeking justice. It is submitted that my client has never acted in concert with any person for any unlawful purpose. All actions undertaken by him were independent, lawful, transparent and guided solely by public interest and pursuit of justice. The warning of “severe and stringent legal action” against unspecified persons is nothing but an attempt to misuse legal process as a weapon of harassment and coercion. On the contrary, it is my client who has been constrained to defend himself against continuous false allegations and threats issued through such notices. It is further submitted that the real wrongdoers are those who have engaged in fraudulent financial activities and are presently facing criminal investigation, and not the victims who have raised legitimate grievances. My client reiterates his commitment to act strictly within the framework of law and respects the authority of judicial and statutory institutions. Hence, the contents of Point No. 12 are denied in entirety and are liable to be rejected.

The contents of Point No. 13 and its sub-clauses (a) to (e) of your notice are false, arbitrary, coercive, intimidating and legally unsustainable and are therefore emphatically denied.

Reply to Clause (a)

It is denied that my client has indulged in any act of defamation, rumor-mongering, provocation or illegal disclosure of confidential documents. Hence, the demand to

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“cease and desist” is baseless and misconceived. My client has at all times acted within the framework of law and in public interest.

Reply to Clause (b)

It is denied that my client has published any unlawful or defamatory content requiring deletion. No specific post, video, message or platform has been identified in your notice. In absence of particulars, your demand for deletion is vague, unenforceable and legally untenable.

Reply to Clause (c)

The demand for payment of Rs. 20,00,00,000/- is arbitrary, extortionate, malicious and without any legal basis. Such an exaggerated monetary demand amounts to criminal intimidation and misuse of legal process. No evidence of loss, damage or injury has been furnished to justify this imaginary claim.

Reply to Clause (d)

The demand for a “public apology” is coercive, humiliating and violative of my client’s fundamental right to freedom of speech and expression. My client is under no legal obligation to issue any apology for lawful acts done in good faith and public interest.

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Reply to Clause (e)

The demand for a notarized undertaking is illegal, oppressive and contrary to settled principles of law. No private party can compel another person to execute such undertakings under threat of legal consequences.

Abuse of Legal Process

It is evident that the demands made under Point No. 13 are intended to blackmail, pressurize and silence my client and other victims of financial fraud. The notice is designed not for justice, but for intimidation and unlawful monetary gain. Your attempt to impose arbitrary timelines and threaten “severe legal consequences” reflects gross misuse of legal machinery. My client shall not succumb to such unlawful pressure tactics. In view of the above, all demands under Point No. 13 (a) to (e) are rejected in toto. My client reserves his right to initiate appropriate legal proceedings against your client for harassment, criminal intimidation, malicious prosecution and abuse of process of law.

The contents of Clauses (i) to (vi) of your notice are false, misleading, coercive, intimidating and legally unsustainable and are therefore emphatically denied. Your repeated threats of criminal, civil and contempt proceedings are nothing but an abuse of legal process intended to harass, terrorize and silence my client and other victims of financial fraud.

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Reply to Clause (i): Criminal Complaint under BNS

It is categorically denied that my client has committed any offence under Sections 356, 357, 351, 351(2), 352 or 61 of the Bharatiya Nyaya Sanhita, 2023. All statements made by my client were based on registered FIRs, public records and bona fide grievances of victims and were made in good faith and public interest. None of the essential ingredients of defamation, intimidation, insult or conspiracy are attracted in the present case.

Reply to Clause (ii): BSS & IT Act Proceedings

It is denied that my client has violated any provision of the Bharatiya Suraksha Sanhita, 2023 or the Information Technology Act, 2000. No specific electronic record, URL, metadata, forensic report or authentication has been produced to support allegations of cyber defamation or stalking. Mere online expression based on facts cannot be criminalized.

Reply to Clause (iii): Civil Suit for Rs. 20 Crores

The threat of filing a civil suit for Rs. 20,00,00,000/- is arbitrary, speculative, extortionate and without any legal foundation. No proof of loss, damage or injury has been furnished. Such exaggerated claims are intended to pressurize my client.

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Reply to Clause (iv): Injunction Proceedings

It is denied that any ground exists for grant of permanent or mandatory injunction against my client. My client has not published any false or malicious content. Truthful and bona fide communication cannot be restrained by injunction.

Reply to Clause (v): Contempt Petition

It is denied that my client has committed any act amounting to contempt of court. No confidential judicial record has been unlawfully disclosed. The threatened contempt action is a misuse of judicial process.

Reply to Clause (vi): Cyber Crime Complaint

It is denied that my client has committed any cyber offence. The proposed complaint is malicious and retaliatory. Your client is attempting to divert attention from pending criminal investigations against himself and his associates.

Conduct of Your Client

It is pertinent to reiterate that your client and his associates are named accused in multiple criminal cases, including FIR No. 0363 and FIR No. 0364 dated 01.12.2025 registered at P.S. Bhusawar, Bharatpur. Several serious offences

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relating to cheating, illegal deposit schemes and chit fund fraud are under investigation. Some accused persons are presently residing abroad, including in Dubai under Golden Visa arrangements, thereby evading effective investigation.

Abuse of Process & Intimidation

The present notice, filled with exaggerated threats and unrealistic demands, reflects deliberate misuse of legal machinery for intimidation and unlawful pressure. Such conduct amounts to criminal intimidation and malicious prosecution.

Final Position

All allegations, threats and proposed actions under Clauses (i) to (vi) are rejected in toto. My client reserves his right to initiate appropriate proceedings against your client for harassment, abuse of process, defamation and malicious prosecution.

Yours truly,

(Signature)

**(MAYANK KHANDELWAL)
ADVOCATE**

Note: A copy of this reply-cum-counter legal notice has been retained in my office for future reference and further necessary legal action, if required.